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**Should major redevelopment in London town centres be
more regionally orchestrated or locally led?**

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Being a Report submitted to the faculty of The Built Environment as part of the requirements for the award of the MSc Town Planning at University College London: I declare that this Report is entirely my own work and that ideas, data and images, as well as direct quotations, drawn from elsewhere are identified and referenced.

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Should major redevelopment in London town centres be more regionally orchestrated or locally led?

Abstract

This study examines planning decision making in the provision of major retail development, at a time when there is a move towards increased regional level planning. It asks who are the influential parties in retail planning, and given the relationships that are formed, which planning authority will generally be best informed to plan town centre change. This is undertaken through an inductive approach in the context of town centre planning and policy in London. The research is led by interviews with a Planning Partner of a large national consultancy based in London specialising in major retail development, a Senior Strategic Planner in the GLA responsible for town centre issues, and the Assistant Director in charge of planning in an inner London borough. Along with other forms of qualitative research, these reveal problems in the conceptual basis of metropolitan retail planning decision taking. This particularly relates to the level of consideration given by planners to the desired organisation of town centre networks. It is found that due to this, the potential 'strategic advantage' of retail coordination at the regional level cannot at present materialise in the metropolis. In contrast local planning authorities, if their capacity is increased, can at least recognise aspects of the possible role of town centres that retail planning has not fully appreciated.

Glossary of Abbreviations

AD	Assistant Director
CBD	Central Business District
CPT	Central Place Theory
DCLG	Department of Communities and Local Government
DOE	Department of Environment
EiP	Examination in Public
GLA	Greater London Authority
GOL	Government Office for London
LBHF	London Borough of Hammersmith & Fulham
LDA	London Development Agency
LPA	Local Planning Authority
OIRM	Oxford Institute of Retail Management
ODPM	Office of the Deputy Prime Minister
PPS	Planning Policy Statement
PPG	Planning Policy Guidance
RPG	Regional Planning Guidance
SSP	Senior Strategic Planner
UDP	Unitary Development Plans
WEP	West End Partner

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INTRODUCTION

“The Government’s key objective for town centres is to promote their vitality and viability by: planning for the growth and development of existing centres; and promoting and enhancing existing centres, by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all.” (ODPM, 2005b: 5).

Central Government’s *Planning for Town Centres*: Planning Policy Statement 6

1. Study Setting

2. Research Background

2.1 City Planning Context

2.2 Private Sector Activity

3. Overall Issues

1. Study Setting

Town centres are complicated places. Town centres are subject to all the interests of the people and organisations who live, work, relax and invest in them. This reflects both the wide variety of current functions and their often recognisable role as historic spaces.

In the setting of major British cities, where many town centres may be identified within the urban boundary, the situation becomes even more complex. With modern personal mobility and lifestyles, there can be multiple claims on town centre places, presenting ever increasing challenges for policy makers and the planning profession.

New trends in the purpose, frequency and expectations of shopping trips, help drive change in town centres. The government has responded with new town centre planning policy, however this has to be implemented alongside alterations in the structure of the planning system. This reform is aimed at both renewing planning documents and procedures, and the level at which decisions are taken.

This policy and planning flux, especially the reorganisation of responsibilities, adds to the tensions in town centre decision making. Given this, the range of town centre interests within the public and private sectors forces the question of who within planning is best placed and informed to 'call the shots' in managing town centres in transition?

2. Research Background

At the outset it is convenient to outline involvement in retail planning with reference to the major organisations of planning authorities, and the private sector -as in this chapter. This helps set parameters for the study, but the two are intertwined.

2.1 City Planning Context

This study is framed in an explicitly metropolitan growth context. A London setting is appropriate as it reveals well planning difficulties and opportunities arising from major development proposals in a densely populated area. Moreover the capital city is furthest down a route of greater urban level government and regional planning. This has helped London's government embrace the growth opportunities of its Global City status via the London Plan, with ramifications across the metropolis. However there needs to be effective processes of negotiating the accommodation and servicing of this growth, given the physical constraints of absorbing consumer activity within the existing metropolitan boundary.

Town centres often help define the established local government area. In London, the focal point of the primary town centre may be the main feature in common across the socially varied local populace. Town centres can play a characteristic civic role, as a well as a site of consumption. In the modern city, the more collective tradition can be obscured by the relative dominance of the other main historic purpose for town centres: as mercantile districts. The commercial developments required to maintain this function against intensified competition are considered in this study. The study looks at one aspect of this, major central retail projects, and the approach of sub-national government in further development. Residents may look to the council in the first instance to regulate over the form of development, especially in the suburbs. However this responsibility is open to challenge and may be subject to alteration, especially in relation to large proposals or 'strategic sites' in London.

Reorganisation of government below the national level is common, and London Boroughs have survived previous restructuring. However local councils in the capital now fear a steady erosion of powers. This is because although the Greater London Authority (GLA) 'streamlined' structure was justified on a limited definition of powers, the organisation's

leader has aligned with central government to seek to expand the reach of the Mayoral powers. As evident in planning, this includes powers of direction over London Boroughs. The rationale behind this is may be to ensure delivery of the expansionist trajectory for London that forms the regional spatial strategy, as agreed by national government. Hence there is development pressure on town centres, as these are conceived in planning policy as prime locations to provide extra floorspace, particularly because London's town centres normally coincide with local public transport nodes.

Accommodating growth in town centres can require substantial yet sensitive planning for major redevelopment. This loads pressure on the planning profession, including from those who are excluded from the political choices driving expansion. This study examines how well informed planners are to respond to this pressure and set the necessary interventions and policy framework.

2.2 Private Sector Activity

With limited revenue-raising discretion, the Mayor of London is pragmatic about how the growth occurs as long as it meets the key priorities in the London Plan. This research addresses Plan formation and implementation to see how retail fits into the main urban concerns, especially those perceived by the Mayor. His approach determines which of the many interested parties are allowed to lobby on regional planning decisions. This includes who within the 'private sector' is seen as relevant, because major town centre redevelopment is restricted to certain businesses and sponsor retailers.

The specifications of retail planning are technical. This may necessitate developers focus on understanding town centres policy and utilise specific positions to gain planning permission. This understanding is also applicable to local planners taking development control decisions.

The private sector ultimately delivers the retail output, and partakes in strategic choices. The availability of information and ideas will vary. This necessitates investigation of the extent of planning involvement in retail, including the role of private and policy planning actors. Policies of different institutions help frame the professional decision making process, and through this examination of the comparative merits of metropolitan regional and local planning for retail can be made.

3. Statement of Overall Issues

This research seeks to establish and explore where emphasis should be placed institutionally in future retail planning, given pressure to accommodate growth within the metropolis. The study considers the role organisations and individuals play in putting forward an agenda for town centres, and how they interact. To do this, it investigates:

- i. who is most influential in planning major town centre retail redevelopment, and why? This is a key step towards addressing the research question, and:
- ii. can regional co-ordination of town centre growth 'add value' to planning practices, and if so how?

These objectives identify where decision making needs to be improved. Apart from further reorganisation, this may relate to professional competence in practices and effective processes.

These matters apply both at a practical level, but also given the plan-led form of planning development, at a theoretical level. Significantly, ideas are used to justify the regulatory path set. Hence an aim is to examine:

- iii. how would the planning profession be better equipped to intervene in contemporary retailing given desired objectives?

This leads to specific recommendations. The matter of organisational resources is not a primary focus, but the investigation may lead to exploration of how valuable ideas about commercial location and functions across metropolitan spaces are. This can help guide how the growth of London's town centres could be based in the future, and who is best placed to make such decisions.

LITERATURE REVIEW

“It is a short step from observing that the largest business centres contain the largest number of functions and attract the most custom, to claiming that this state of affairs is entirely proper and should be maintained through planning policy.” (Guy, 1980: 119).

Clifford Guy's seminal *Retail Location and Retail Planning in Britain*

4. Introducing Retail Change and Thought (Literature I)

4.1 Established Retail Concepts

4.2 More Recent Town Centres Thought

5. Planning and Town Centres (Literature II)

5.1 Retail Planning Concepts

5.2 Planning as Public Intervention in Retail

5.3 Planning Lacunae and Effectiveness of Practices

Note:

RESEARCH APPENDIX A: (Contemporary Consumers and Retailers, and Identifying Central Place Theory Issues)

RESEARCH APPENDIX B: (Planning Principles and New Priorities, and The Paths to Present Policy)

4. Introducing Retail Change and Thought (Literature I)

The literature is organised for the study on the basis of two related components: to introduce retail themes and then set the background for the role planners play in town centres. This chapter starts with a section on the core commentators and concepts found in retail studies, and an overview of the primary themes as retail has changed. It contains a summary of the influence of certain economic ideas as these have been crucial, however a more detailed evaluation of applied literature in support of this can be found in Appendix A. It is instructive to consider the influence of these research strands, and this is done in the second section by placing retail ideas in the context of town centres as whole, and related notions and agendas for delivering retail development.

4.1 Established Retail Concepts

Standard Texts and Subservient Shoppers

The most modern comprehensive text on the distribution of retail facilities is Birkin *et al*'s *Retail Geography and Intelligent Network Planning* (2002). This adopts a holistic approach through applying information technology and geographic modelling; a progression from the strongly descriptive approach of many early studies (see Wilson, 1988). In the view of Birkin *et al* (2002: 1), little progress on retail networks has been made in the last two decades since "landmark publications" in 1980. These were by Dawson, and most notably *Retail Location and Retail Planning in Britain*, by Guy. These prompted further work such as Davies (1984). These standard texts remain the basis of much thought on how retail concepts and planning practices relate. Yet these works (new and older) tend to avoid the politics of decision making when regulatory factors are addressed. This stems from the origins of orthodox retail studies.

The role of the consumer has to be considered as a determinant of shopping provision. Traditionally, standard studies focused on retailing took classical economics as axiomatic. This subscribed to a view of retailing:

"as a reactive (non-productive) sector of the economy whose behaviour responds to consumer needs, tastes and fashions rather than helps form them in the first place."
(O'Brien and Harris, 1991: 2).

Therefore the shopper was the starting point and the retailer reactive, with no formative role for corporate policy. The clearest exposition of the demonstrable fallacy of the 'sovereign shopper' was Galbraith's (1958) seminal *The Affluent Society*. This still has fundamental ramifications, including for requirements for shop space as this will tend to be

driven by major retailers, rather than occupied once provided. In turn, this process engages developers in the planning process in response to corporate location policy. Yet the notion of shopper self-determination can loom large.

Economics and Orthodoxy

Clifford Guy has been the most prolific British retail commentator, approaching retail location as predominantly a concern of commercial operations. Guy (1980) noted the range of background of retail research, including sociology and psychology and highlighted the increasing concern of management schools, arising from advances in market research techniques. However economic and business perspectives have tended to prevail in standard texts over other determinants of commercial location until recently, due to the financial importance of the retail industry.

This disposition has also historically dominated the perception of commercial distribution in the form of Central Places (Christaller, 1933) through its subsequent theoretical adaptation (for example, Losch's (1954) *The Economics of Location*). It is neither possible nor desirable to fully revisit the mass of work on Central Place Theory (CPT) here, but it has never been possible in any spatially-sensitive account of retail and policy to ignore its influence (Dawson, 1980a) even in the complexity of contemporary consumption.

CPT was tested and refined, and has usefully instigated substantial research in to commercial location.¹ However wider economic theory has not necessarily advanced alongside new forms of retailing. In CPT's contemporary application, its associated explanatory power about spatial decisions may have dwindled. Moreover this leaves the classical concept of absolute consumer power intact, fostering an overlooking of corporate policy and its interaction with regulators.

Patterns of Retail Change

The most prominent spatial idea employed by retail researchers seeking to describe recent changes in general shopping patterns has been decentralisation notions. This arises from the readily observable movement of retailers to new locations. This is absolute decentralisation if a shift to peripheral urban sites is seen in isolation. However Kivell and Shaw (1980) more usefully regarded retail relocation as significant if 'relative

¹ With respect to retail planning, contemporary empirical studies have found that variables such as transport cannot be glossed over given time considerations and trade offs with personal costs (for example Collins *et al*, 2005).

decentralisation': movement outside the established commercial core in a relative sense against the geography of those it seeks to serve.²

The most popular depiction of this process has been the broad theme of *waves of decentralisation* outlined at various stages by Russell Schiller (for example, Schiller, 1999). This easy to grasp notion highlighted longstanding retail shift as it worked out through successive changes in the pattern of shops for certain types of goods. Seen this way, the superimposition of accelerating retail decentralisation on an established set of places was deeply alarming through the established lens of central spaces:

"growth of further out-of-centre retail-commercial complexes could jeopardize the very basis of CBD existence and portend the end of the central city in its traditional form."
(Rowley, 1993: 110).

As Kivell and Shaw (1980) foresaw, the primary driver behind this concern was a political fear of inner-city ghettos as witnessed in America.³

The prominence of major supermarket retailers in Britain sustained a focus on convenience (grocery) goods. Due to this, until the 1990s recession the shifts had been seen as relatively benign by retail commentators in terms of net outcomes for towns. As Thomas and Bromley (1993: 133) found "deflection of bulk grocery trips from city centres... allowed the centres to cater more efficiently for the specialist shopping function which is their chief attraction." Nevertheless, the third wave of decentralisation soon began to undermine the attractiveness of town centres, as it featured their specialist shopping offer, such as clothes. This concern intensified as developers have become more adept at both quantitatively and qualitatively expanding the appeal of non-food retailing in out-of-centre parks.

The phenomenon of substitution of retail for uses such as restaurants and indoor recreation has also been empirically demonstrated (for example Jones *et al*, 2004).⁴ Today, modern retail developments (such as purpose built 'regional' centres) have evolved into broader destinations competing head-on with town centres to dominate high value expenditure (see Thomas *et al*, 2004).

² This should be at the forefront of the thinking of integrative practitioners such as planners; O'Brien and Harris (1991) criticise the fascination with the phenomenon of 'absolute' decentralisation, arguing that little insight is gained from the spatial retail perspective if it merely represents businesses following the accelerated decentralisation of residents and jobs to suburban locations that culminated in the late 1980s.

³ However Guy and Lord (1993: 108): dismissed "uninformed and alarmist commentary on decentralization in Western Europe" on the basis of a comparison of Cardiff with Charlotte, North Carolina. Cardiff had performed well because it had retained the growth areas of services and durable goods centrally.

⁴ As Tallon *et al* (2006) note features such as late-night opening pose increasing planning challenges for town centres.

Summary

The first part of this section raised the issue of problems in applying dominant concepts, when these are derived from a model of classical economics that hold limited contemporary use over modern factors of shop location. The section, supported by Appendix A, depicted increasing recognition that large organisations pursue spatial agendas, and this leads to an active involvement in other strategies such as retail development. Finally, it was shown how the decisions of retailers have led to concerns with the performance of town centres in Britain. Overall these ideas suggest the role of political choices needs to be considered as much as those attributed to shoppers, especially when a firm national planning policy on retail location has been in place for over ten years.

4.2 More Recent Town Centres Thought

Retail studies remain fragmented across disciplines. However as proximity does matter in shopping patterns, as many investigations have shown (for example Guy and Wrigley, 1987; Thomas and Bromley, 1993), geographical schools of research remain highly relevant. Recent developments in geographic thought provided some new approaches to commercial location studies.

"For far too long, retail geography has been oblivious, indifferent and occasionally hostile to changes outside of its self-contained 'applied' loop". (Blomley, 1996: 238).

Fresh challenges to the orthodox ways of thinking about retail places were needed. Progress began to be made in the 1990s by applying economic geography insights to retail, but this 'New Retail Geography' was usurped shortly after by a cultural turn across geography; see Lowe and Wrigley's (1996) *Retailing, Consumption and Capital*. More rigorous consideration of the place of cultural imperatives though (for example lifestyle modes of sub-groups across space) can add to appreciation of town centres in urban society.

A greater social sensitivity has led to an important appreciation of shopping as leisure (see Newby, 1993), rather than as pecuniary exchange alone. Similarly, an understanding of the qualitative role of town centres reveals historic significance - both industrial (Winstanley, 2000) and medieval (Waller, 2000) - bound up in British towns. Moreover the collective and social role of the old trading centre can be traced back further, to the form of society in early urban civilisation. Central spaces in ancient cities such as the 'agora'

were public places pivotal to social regulation, and with this understanding it is apparent there can be democratic implications of contemporary transformations in shared space (Sennett, 1999) associated with redevelopment. With increasing private ownership and high profile management of main routes in purpose built retail areas, some now judge genuine access to an environment fully within the public domain is the defining feature of a proper central urban area (see Ruston, 1999).⁵

In summary, newer perspectives on retail remind of the need to ask: whose space is the town centre, and therefore what purpose should retail development serve within it. This is pertinent, for as Dawson (1999) notes, effective intervention depends on a clear view of the purpose of town centres. URBED (1994) detailed the functional definition of a 'town centre' as a place where a range of needs can be met through one trip, a diversity of uses⁶ (including as a place to live), and with retail remaining as the single most significant defining aspect. It is clear a balanced approach is required, setting retail change in the variety of interests that are associated with town centres.

⁵ Davies (1984: 282) noted retail developments always seem bring "greater authoritarianism and conformism in the conduct of life within large tracts of the central area." The original shopping malls of the US were conceived as a contemporary reflection of the need for the agora (Lowe, 2000) although this depends on a partial deployment of 'social interaction' and 'civic society' constructs.

⁶ The potential for offices to form the next wave of decentralisation from central areas (see Rowley, 1993) has been appreciated by policy and included within PPS6 (see Appendix B). However it has become recognised that environmental factors in addition to the representation of commercial activity influence performance, and this has been behind the expansion of 'town centre management' initiatives. There is empirical evidence of town centres competing better on the basis of factors such as security (see Oc and Tench, 1993).

5. Planning and Town Centres (Literature II)

The second part of the literature review picks up concerns identified in literature so far: both about problems arising from slanted views taken on retail as a subject, and concern that decisions of a political nature should be recognised. Therefore this chapter looks explicitly at policy, planners and professional approaches to town centres. Firstly the key concepts as manifested in planning are explored, and then how planners tend to act to deploy these prevailing concepts. Finally this helps outline gaps in research.

5.1 Retail Planning Concepts

The dominance of Central Place Theory in thinking about commerce across space has been critical in British spatial management through the longstanding concept of the retail *hierarchy*. Until the 1970s, a structured hierarchy amending CPT to local circumstances reconciled differing needs well.

“From the planning perspective this system was considered capable of providing retail services efficiently for the vast majority of the population; it was viewed as a system worth maintaining.” (Bromley and Thomas, 1993: 6).

The hierarchical organisation of commercial territory can accord with traditional thinking about settlement patterns; however urban decision makers have to be responsive to strong economic drivers of change. This is challenging, as Hall *et al* (2001) found through evaluation of long-term trends: retail expansion is a difficult concept to align with the dynamics of relative city performance through vertical hierarchy. The degree of complexity requires sensitive concepts, whereas Fyson (2005: 10) asserts: “the old retail hierarchy ideas take insufficient account of local variations in shopping preferences.”

From the on-the-ground view of retail industry insiders such as England (2000), with the pace of retail change, the fundamentals of mono-dimensional hierarchical models are open to challenge. Bird (1977) advocated a triangulation of CPT principles with other spatial frameworks such as agglomeration economies. This could assist the degree of applicability required by retail planners. OIRM (2006) research highlights shop format change in London reducing the contemporary utility of a metropolitan hierarchy. Yet these problems do not disturb the hierarchy's embedded position at the core of spatial policy at all planning levels (see Appendix B).

The vertical hierarchy has maintained its hold over policy makers. Dawson opined the hierarchy acted as a “straightjacket.... Planners are forced into this position however,

through a lack of viable alternative" (1980c: 236). With planning decision takers reliant on an established hierarchy, any decentralisation can be perceived as maladjustment unless a planning case for change in policy has been successfully made.

The professional means to deal with the dynamics of retail, and form a reasoned planning judgement on impacts of development on the existing town centre has been through liberal use of the ideas of *vitality* and *viability*. These two words are critical in a planner's rhetoric, a reliance forming "an unfortunate limitation on thinking" (Cullingworth, 1997: 950). The terms (the former meaning how busy a centre is, whereas the latter describes town centre commercial robustness) have become favoured as concepts. Although accepted by government as static descriptions, as Cullingworth implies, the planning insight is limited.

In summary, the limitations of CPT could question the basis of retail planning decisions. There is a number of practical problems arising in town centre planning. The primary one is recognition within policy that whilst a hierarchy may or may not offer a convenient descriptive metaphor, this forms a snapshot view (rather than necessarily representing an active planning decision).

5.2 Planning as Public Intervention in Retail

Planner Attitudes to Retail

Davies (1984: 1) asserted retail "has been dealt with in a piecemeal fashion... often treated as an appendage of the general field of land use studies." As traced in Appendix B, this position evolved and retail planning began to be taken more seriously again by government in the late 1980s as political concern about town centre fortunes rose. By the 1990s, URBED (1994) found three-quarters of chief planning officers placed vitality and viability as the second or third most important local planning priority.

More government sponsored research of this nature is required today, but perhaps more valuable would be ascertaining if the view of Dawson (1980b: 197) holds true: "land use planners who have been left with the task of retail planning appear to have been unable to decide whether retailing is an economic activity or a social service." This portrayal of a dichotomy in intervention necessary again raises the question of the underlying objectives of pro town centres policy as a means of retail planning.

From Government to Governance

Traditionally, public policy rarely felt a need for active justification of planning-style interventions (Davies and Kirby, 1980). This assumption came under attack with the radical laissez faire government of the 1980s (see Taylor, 1998). Some of these prescriptions are now in the contemporary mainstream of British governance, but as shopping is not the 'perfect market' of the classical economist it is regulated in many forms. Intense retail competition does not transcend space.⁷ Governance over development remains significant, but the form and means of sub-national intervention requires consideration.

As Marsden and Wrigley (1996) highlight, the free market ideology revival in the 1980s did not remove regulation but remodelled it, leaving much self-regulation of corporate interests and local partnerships; a scenario of governance under the auspices of a generalised and loosely conceived public interest. As Tewdwr Jones and McNeill (2000) posited, this form of 're-regulation' has been a key feature through the last couple of decades of changes in metropolitan governance. In contrast to this transformation, smaller planning authorities at the local level may hold closer on to established relationships: from evidence across Europe, Newman (2001) found local factors significant in the varying responses to metropolitan reform. Thus there may be internal variations.

Regional level planning has also fluctuated historically, partly in response to political aspirations for more strategic policy (see Wannop and Cherry, 1994). A new chapter of regional planning is now underway, across England under the new system of the Planning and Compulsory Purchase Act (2004). In London, demands arising from Global City status (see Sassen, 1991), is one fundamental reason why citywide planning powers have already been reintroduced, and the future of suburban centres is subject to active discussion (see GLA, 2006).

Summary

Planning's relationship with retail has not been considered sufficiently. When this has been contemplated, the appreciation of change, and view on the proper nature of planning activity, has varied. In addition, further uncertainty arises from institutional reform, and changes in London's governmental ability to regulate and accommodate development.

⁷ This will dimension will prove ripe for future research given the implications of new communications technology and 'e-tail'. Additionally although Neale (2006: 8) highlights the Barker Review's interest in relaxing retail planning restrictions, the implications for productivity and the property market may be more complex. For example Wrigley (1991) demonstrates that securing sites with planning permission and gaining market access can be the key differential element of competition for larger retailers, not goods price.

5.3 Planning Lacunae and Effectiveness of Practices

Professional Disposition

Retail planning has not been progressive. Kivell and Shaw (1980) noted the persistent favour for status quo, chiming with England's (2000: 38) depiction of a longstanding professional "search for order". Dawson (1980b: 201) expressed the situation most presciently:

"the cynosure of most activity in Britain has been the control of the process of retail decentralisation. The rationale for this goal is far from clear, but would seem to be related to the definition of the planning task as the creation of equilibrium, usually static equilibrium, within urban areas."

The policy rationale for resisting retail decentralisation has advanced (Appendix B), but there is a need to explore how far this has penetrated the professional psyche, to determine how effective planning institutions are in delivering policy. Arguably a 'conserve and contain' mentality has been a dominant professional mindset (Cullingworth, 1997). This is problematic if inadequacy in managing change is laid bare by rapid retail innovation (see England, 2000). As Lowe (2000) demonstrated in the USA, all emergent modern urban forms have been initially perceived as unnaturally haphazard, spawning new challenges that may be unwelcome.

Schiller (1999) tends to portray relative retail decentralisation as an inevitable process, and from the orthodox perspective seeks to downplay public sector action, however he conceded local authorities have played a significant role in protecting town centres. Nevertheless, retail planning has been seen by those outside the profession as ineffectual or sluggish. "Without doubt the major effect of land use controls has been to delay development" concludes Schiller (1999: 402).⁸ The validity of these claims requires further analysis with respect to a major town centre redevelopment.

The most significant accusation in relation to planning for growth is of poor analytical approaches in retail, through dependency on variants of central places and a confusion of assessment versus strategy formation (see Guy, 1980). This remains an issue: commentators do not suggest this tendency has been challenged by revolutions in how economy and space is conceived.⁹ This occurs as the profession has been able to

⁸ Alternatively, Davies (1984) criticised the profession for accepting poor quality development merely because it lies within a delineated town centre.

⁹ The relationship between innovation, environments and economy has been attracted attention, but despite recognition of retail innovation in geography (Alexander *et al*, 2005 for example) minimal progress has been made towards applying understanding in spatial policy.

entrench itself in everyday governance, and is insulated by its position embedded within a wider state bureaucracy (see Campbell and Marshall, 2005).

Specific Research Gaps

Davies (1984: 7) falls short of condemning the planning profession for weak understanding of retail change, citing problems of resources and political leadership. He also noted the difficulties arising from a private sector hostile to collective action, and finally also blamed “educationalists” for the preponderance of descriptive evaluations. Shepherd and Thomas (1980: 85) detailed:

“the exclusive emphasis of most research on either rigorous research methodologies which sometimes appear far more sophisticated than available data sources, and to be remote from practical planning implications, or on short-term commercial or planning exercises, which have minimal theoretical orientation”.

Problems with data sources for retail planners remain a major issue, and are becoming increasingly contentious due to the course of national retail policy (Appendix B).¹⁰ However there are more conceptual concerns in need of exploration. The dichotomy between the different motivations of academic and commercial interests remains today, despite the flavour of research varying according to recent retail or political imperatives.

Gaps exist between institutional agendas for research, to the overall detriment of retail understanding. Planning is constricted by this, but it also limits the ability to assess and to deliver desirable retail change. Commercial pressures still shape positive fields of investigation. For example, the financial gains possible in the retail property market have begun to drive a search to expand the scope of research, but still suffer from a “perfunctory treatment” given to local policies (Jackson and Watkins, 2005: 1454).

This is an outline of under-researched retail planning areas, but the reasons for this, especially institutional relations, need to also be recognised. This would aid a movement towards more generation of new ideas of retail location. Moreover, Lowe and Wrigley (1996) opine the current vacuum of theory permanently restricts spatially sensitive retail research as applied study; a loss to all social science and urban understanding.

Summary

Many domains of retail planning practices may benefit from new measures, or greater availability of more contemporaneously applicable ideas.

¹⁰ This study does not seek to rectify this, but explores the ramifications further.

STUDY METHODOLOGY

“Regional planning bodies and local planning authorities should: actively promote growth and manage change in town centres; define a network and a hierarchy of centres each performing their appropriate role to meet the needs of their catchments; and adopt a proactive, plan-led approach to planning for town centres, through regional and local planning.” (ODPM, 2005b: 7).

Central Government's *Planning for Town Centres*: Planning Policy Statement 6

6. Broad Approach

7. Explanation of Techniques

Note:

APPENDIX C (Interview Preparation)

6. Broad Approach

This is a piece of qualitative research investigating the influences on, and relationships between, those most involved in town centre growth decisions. Processes of sub-national regulation offer a fertile terrain to investigate uneven development in society, but have tended to be focused on socio-economic determinants of spatial variations in public policy, thereby suffering from a lack of examination of power relations in policy making (Duncan and Goodwin, 1988). The study aims to be sensitive to the institutional pressures, and other related factors, in how the framework is set for major town centre development decisions. In order to draw out the implications of these political processes, an understanding of the actual and desired distribution of commercial places is required. These perceptions are informed - but not defined by - theory, and the research aims to be open to recognising the hold dominant concepts can have over contemporary planning thought and application.

Kuhn's (1962) seminal notion of the *paradigm* in the reproduction of scientific knowledge across research communities, is pertinent in this respect. This identifies that a 'regime of knowledge' often forms limitations on academic investigation, often observed in the field of social research (Silverman, 1997) including, as Taylor (1998) noted with necessary caveats, the professional endeavour of planners. Retail studies have also been influenced by commercially-sponsored agendas, with further limitations arising for sub-national policy research. Thus the study methods here are conducted as Gilbert (1993) posited, mindful of the parameters of supposed 'normality' that define, and are reinforced by, any retail planning paradigm.

The study tackles head on two aspects of retail development investigations that have been long under-researched.¹¹ This is the main gap in retailing research on retail supply (Guy, 1980), and the longstanding absence of accounts of political processes in shopping policy decision taking (Dawson, 1980b). These weaknesses remain the case today, as 'consumer culture' has become well inspected but not often related to urban development. Jackson *et al* (2006) are an example of this continuing attention on consumption traits, yet draw out the necessity for studies to be sensitive to local environments in order for

¹¹ Planning is only one form of retail regulation, but forms the focus here, not least because of the extent to which the approach as an explicitly policy led process is statutorily embedded. Health and safety, and trading standards are other examples of intervention, but it is the most direct form of public action to facilitate 'fair and free' economic activity – competition policy – that impacts most significantly and could benefit from further investigation of spatial ramifications.

regulation overall to be effective, and to ascertain a 'politics of place'. This cultural approach can tend towards an atomised view, difficult to place in spatial context, continuing the trend for studies to prove myopic in their potential applicability by urban practitioners, as first noted by Shepherd and Thomas (1980). Applicability of ideas is directly addressed in this study.

There has been much more attention on convenience (grocery) good changes in shopping, now largely dominated by the big supermarkets, than on goods now typically retailing on the High Street. Thus the major concern in this town centres study is with recent trends in how 'comparison goods' shopping provision is made. This basis allows the research to fully examine the issues raised above with respect to retail in town centres and metropolitan planning.

The following diagram (Figure 1) maps out the way the research was structured. With an inter-disciplinary perspective, the study takes forward the objectives highlighted through integrated qualitative techniques. This commenced with literature and documentary information (particularly the critical arena of sub-national planning policy), leading to evidence from a specific case and in-depth interviews. This provides a rich understanding to explore relevant findings, to inform conclusions and recommendations in turn.

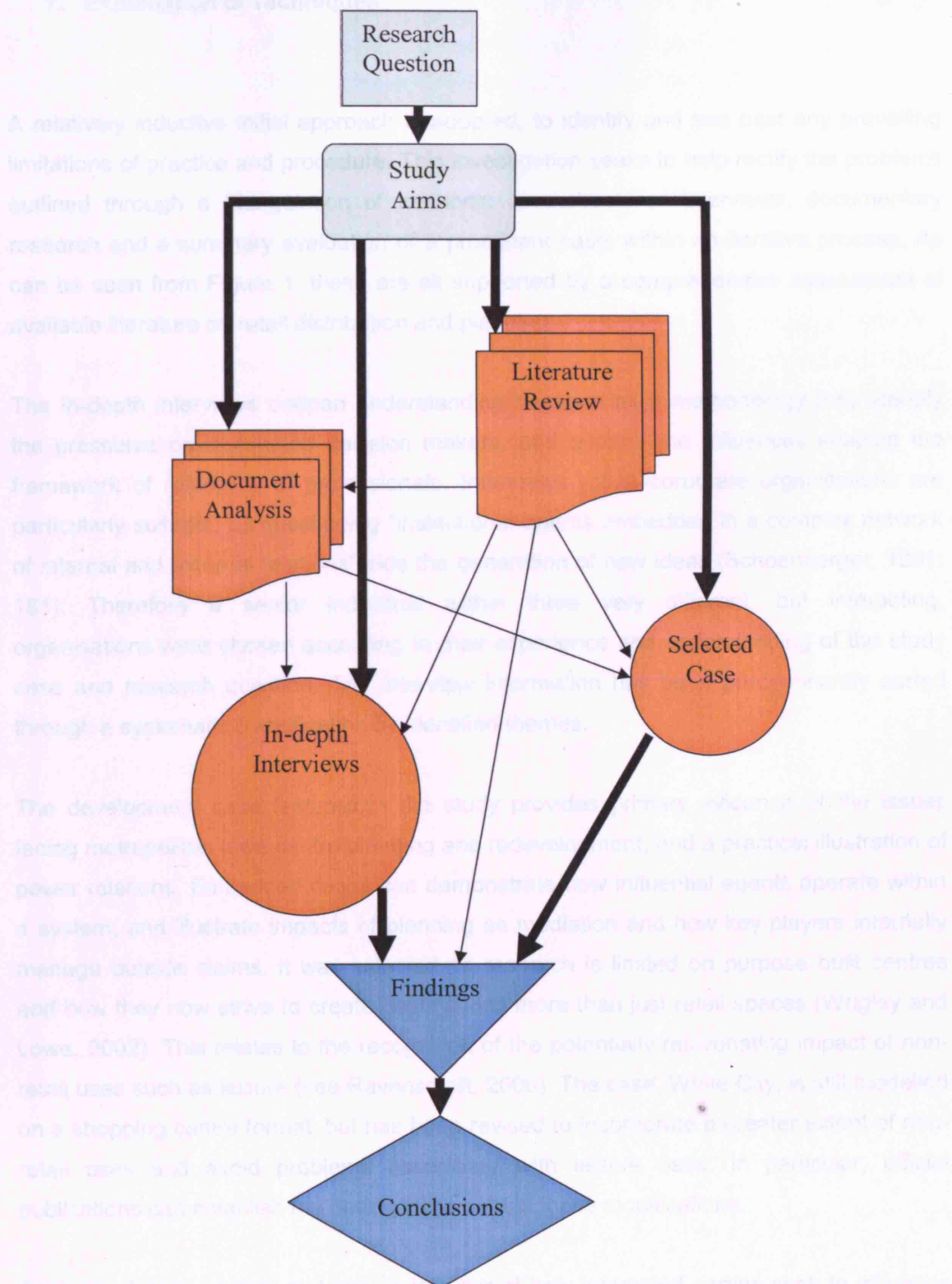


Figure 1: Study Research Diagram

7. Explanation of Techniques

A relatively inductive initial approach is adopted, to identify and see past any prevailing limitations of practice and procedure. This investigation seeks to help rectify the problems outlined through a triangulation of methods: semi-structured interviews, documentary research and a summary evaluation of a prominent case, within an iterative process. As can be seen from Figure 1, these are all supported by a comprehensive assessment of available literature on retail distribution and planning.

The in-depth interviews deepen understanding because as a methodology they identify the pressures on nominated decision makers, and explore the influences shaping the framework of reference of professionals. Interviews within corporate organisations are particularly suitable, as questioning “institutional agents embedded in a complex network of internal and external relations” aids the generation of new ideas (Schoenberger, 1991: 181). Therefore a senior individual within three very different, but interacting, organisations were chosen according to their experience and understanding of the study case and research question. The interview information has been predominantly sorted through a systematic classification by identified themes.

The development case featured in the study provides primary evidence of the issues facing metropolitan town centre planning and redevelopment, and a practical illustration of power relations. Embedded cases can demonstrate how influential agents operate within a system, and illustrate impacts of planning as mediation and how key players internally manage outside claims. It was selected as research is limited on purpose built centres and how they now strive to create destinations more than just retail spaces (Wrigley and Lowe, 2002). This relates to the recognition of the potentially rejuvenating impact of non-retail uses such as leisure (see Ravenscroft, 2000). The case, White City, is still modelled on a shopping centre format, but has been revised to incorporate a greater extent of non-retail uses and avoid problems associated with leisure uses. In particular, official publications can establish the driving force behind these modifications.

Analysis of documentary material¹² helps depict how interested parties seek to influence the formal process of planning policy formation and decision taking. This research

¹² The written medium can be crucial to unlocking views held by those marginalised or uncomfortable with more personalised means of communication (Hodder, 2000) that would remain unarticulated elsewhere in spheres of corporate strategies, elite opinion formers and legal process. Despite this it was found there has

primarily reviews the evolution of applicable planning policy by tracing themes through from previous documents. Qualitative data generated in this study is analysed through categorisation and classification, as outlined by Kitchin and Tate (2000). The method of analysis overall is interpretative.

This investigation does not seek to present an independent *reflection* of decision making, as this may not be achievable (see Miller and Glassner, 1997). However the study should provide guidance on the appropriate application of concepts by institutions, in response to Duncan and Goodwin's (1988) call for examination of the values, assumptions and roles of professionals in governance to light up the dark world of public policy formation. The research seeks to be formative through these methods, to shape a fuller understanding of town centre planning decisions.

been little success evident in engaging the public in general (let alone under-represented communities) directly in town centre planning.

ANALYSIS AND INITIAL FINDINGS

“Mr Livingstone is found wanting in the way he exercises his decision making powers. It is a secret garden to which neither Assembly Members nor the public have access, but powerful property interests do.” (London Assembly, 2002: 1).

Behind Closed Doors (Report on Access to the Mayor of London’s Planning Application Decisions)

8. Policy Perspectives

- 8.1 An Inner London Local Planning Authority
- 8.2 London Plan Formation and Town Centres

9. The White City Centre

- 9.1 Site Setting and Developer Proposals
- 9.2 Case Features and Results

Note:

RESEARCH APPENDIX B: (Planning Principles and New Priorities, The Paths to Present Policy, and White City Formation of Positions)

8. Policy Perspectives

In a plan-led system, policies are important as an interface between specific development pressures and theoretical dimensions. The synthesis of literature highlighted gaps opening up in understanding with retail change; the response of policy makers is critical.

This chapter sets out research from documentary sources (including those used by the GLA or councils to support their retail planning decisions) on which following chapters build. The focus of this work is sub-national, although the centralised basis of national planning policy needs recognition (this is considered in Appendix B). Nationally, retail planning policy shifted towards a strong position sometimes seen as almost a ban on relative decentralisation: an over simplification. It was better characterised as requiring planning authorities put town centres first for development, and now emphasises positive retail provision.

The chapter looks at the effectiveness of participants in the policy formation process, examining how they seek to shape strategic planning decisions wherever taken, and the ideas that 'win out' in these processes. The first section starts with local policy, but the remainder of the chapter is focused London-wide, partly as the stakes are so high. Policy objectives should be considered alongside their implementation, for example the illustrative White City Centre case.

8.1 An Inner London Local Planning Authority

The London Borough of Hammersmith & Fulham (LBHF), located between central London and the western suburbs, was chosen for examination of local statutory planning policy. This was because the issues here of density and retail development pressure are relevant to much of London, and are put in the context of a specific town centre redevelopment in the next chapter.

The council's Unitary Development Plan (UDP) review made significant progress in 2001 and 2002, but with little development of a borough vision for town centres (as can be seen in Appendix B). Analysis of UDP formation reveals little specific long-term direction for town centres in the borough individually or collectively, despite the insertion of a new Town Centres chapter in the last Plan revision (LBHF, 2003). The policy for large retail

developments changed little, and having formed a pro town centres approach originally, it accorded closely with national policy.¹³

The main shopping issues were felt by the council to relate to the large White City development –this effectively was the borough’s retail strategy (as the next chapter shows). Policy evaluation finds very little, or little that is local, about town centre redevelopment potential in the UDP. Therefore change is unlikely to be plan-led as wished by the government, and consequently there are few opportunities for positive planning.

To illustrate the broad themes of concern to policy writers, an overview evaluation of the local Plan (UDP) keyword usage, and for comparison government policy PPS6, has been undertaken. The results shown in Table 1 divide total word count by the use of keywords (as identified in the literature and Appendix B). The UDP is constituted of two parts, I: charged with providing an integrated local strategy, and II: based on topics. UDP chapters on retail and town centres have been combined, whilst the ‘strategic’ chapter is separate.

Table 1: Policy Keyword Usage

	Adopted UDP		PPS6
<i>Words per ...</i>	<i>Town Centres/ Retail Chapters 9&10 (in Part II)</i>	<i>General Strategy Chapter 1 (=Part I)</i>	<i>Whole Document</i>
“Vitality”	596	[Infinite]	632
“Hierarchy”	3,875	[Infinite]	667
“Network”	1,292	1,111	545
“Strategic[ally]/strategic”	1,192	151	2,400
“Positive”	3,100	5,000	1,000

Source: Compiled from LBHF (2003) and ODPM (2005)

Note: Word count excludes document headers; PPS6 total calculated at 12,000, UDP chapters, 1, 9 and 10 as 10,000, 7,500 and 8,000 respectively.

This is a basic and indicative technique, but gives a portrayal of the focus of retail planning policy on “vitality” (inevitably with “viability”), whereas “strategic” aspects are most stated in UDP Part I: compartmentalised. It suggests one of the main features distinguishing UDP wording from national policy, is the council’s relative reluctance to be “positive”.

¹³ The only local spatial strategy for large commercial developments (“TC1”) is focused on development control of large offices only (LBHF, 2003: 295).

Hammersmith & Fulham was one of seven (out of the total of 33) London LPAs to participate in the scrutiny of the draft London Plan's retail and town centres proposals. Interestingly, the borough sought to 'rein in' the GLA's aspirations by requesting the London Plan comply fully with national policy (see LBHF, 2002b). In this case the council, and large other objectors such as Sainsbury's, prevailed: it was decided the original proposals were an "unnecessary and unhelpful elaboration" (Richardson and Simpson, 2003: 95).¹⁴ A senior local planner was interviewed and stated this was merited as a response to local shopping provision.

In summary, evaluating applicable local planning policy suggests that one of the major issues for the council has been immediate issues of defending town centre 'vitality'. This research finds that the council attempted secure this with policies setting a strong development control base. Evidence points to the council 'guarding' against London Plan intrusion in this respect. These efforts distract from strategy formation, the focus is not on plan-led development. This approach is inconsistent with government policy, but the rules they enforce can help LPAs fight their case.

8.2 London Plan Formation and Town Centres

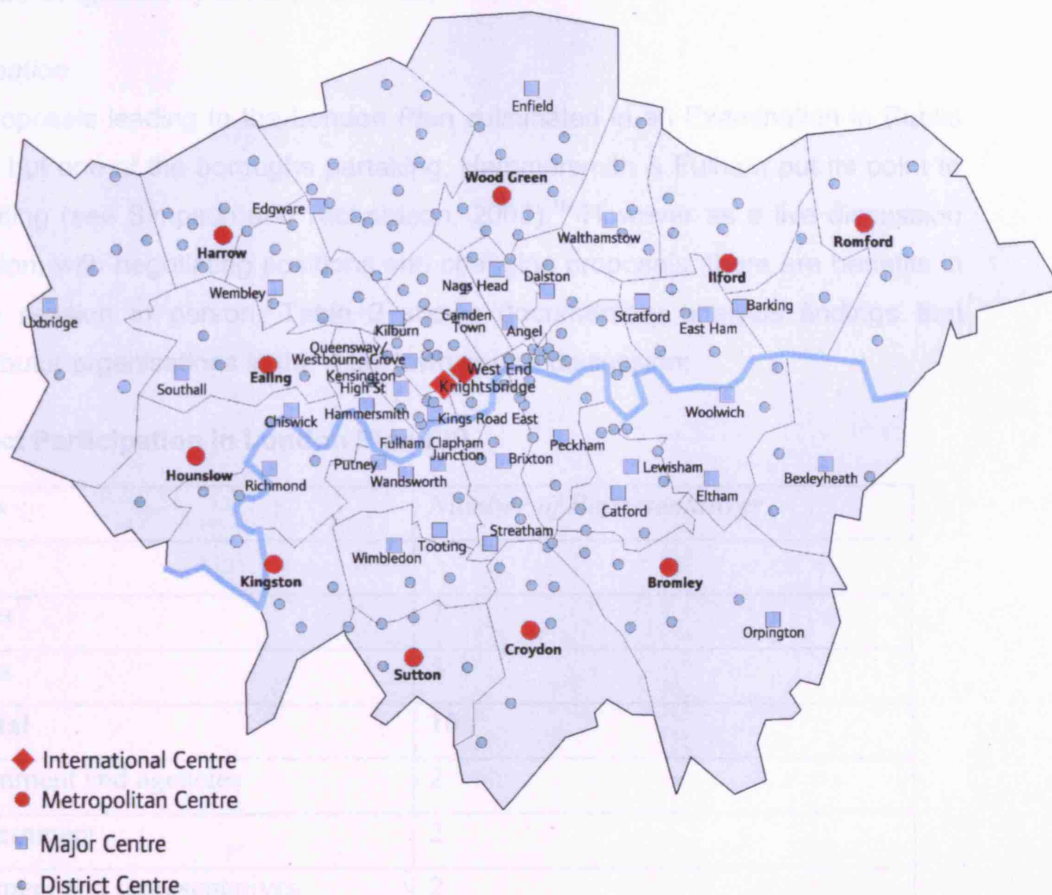
This section introduces the significance of the hierarchy of town centres in the London Plan, and then looks at data on the type (and size) of organisation that became most involved in the forming the London Plan.

Views and Changes in the London Plan

Most of the response by LBHF to the draft London Plan (see LBHF, 2002b) concerned the White City Centre scheme in the borough. One persistent comment is disappointment that despite the growth and functional change associated with planning permissions within Shepherd's Bush town centre, the centre was to retain its lowly 'District' status in the London Plan's hierarchy of centres (note Table 4). The London Plan hierarchy subject to this objection is reproduced overleaf in Figure 2:

¹⁴ A GLA planner interviewed implied this was the result of central government (GOL) not appreciating the metropolitan retail circumstances that needed to be taken into account.

map 3D.1 London's Network of Town Centres

**Figure 2: The London Plan Town Centres Hierarchy (GLA, 2004)**

This can be seen as emblematic of the rigidity of the GLA's vertical prescription, and therefore the council asserted: "the town centre hierarchy requires an overhaul to reflect current and proposed aspirations" (LBHF, 2002b: 2). The hierarchy is an example of difficulties of static descriptions of town centres, if retail change is to be incorporated in planning strategy. With the widespread spatial and functional distribution of the town centres visible above, it is apparent the hierarchy map may reflect practical pressures as much as thought about the direction of London's town centres.

The inclusion in initial London Plan proposals of a policy theme of 'consolidation', 'neutral' or 'regeneration' alongside this vertical functional ordering was criticised by planning experts Richardson and Simpson (2003). Consequently, this element of prescription was removed thus rendering the hierarchy ostensibly almost entirely explanatory of current

perceptions.¹⁵ In this regard, the London Plan fails Breheny's "acid test of regional planning": it can be ignored by LPAs (1993: 102).

Policy Participation

Scrutiny of proposals leading to the London Plan culminated in an Examination in Public (EiP). Like all but one of the boroughs partaking, Hammersmith & Fulham put its point to the EiP in writing (see Simpson and Richardson, 2003).¹⁶ However as a live discussion and examination, with negotiating positions and changing proposals, there are benefits in attending the session in person. Table 2 shows documentary analysis findings that classify contributor organisations in the retail/town centre discussion:

Table: 2 Direct Participation in London Plan EiP

<i>Organisations</i>	<i>Number of Representatives</i>
Big businesses ¹⁷	7
Other business	3
Business: total	10
Central government and agencies	2
Regional government	2
Local government and representatives	2
Government: total	6
Sub-regional business-council partnership	1
Voluntary/civic	2
GRAND TOTAL	19

Source: Compiled from Richardson and Simpson (2003: A52).

This analysis of the Inspector's Report following the EiP, indicates the Planning Inspectorate (a central government agency) invited a couple of representatives of all the main forms of government and commerce. Despite the presence of voluntary groups, no-one attended directly on behalf of the consumer. Moreover it is clear that business interests formed the majority participant in this aspect of London's town centre strategy formation, especially large retailers. In terms of sectors, the Inspectorate is under some

¹⁵ Similarly, a discussion arose from this evaluation on the 'polycentricity' in London (as depicted in Figure 2) and an over-arching integrated policy for town centres was introduced.

¹⁶ A local civic society, and a consultant on behalf of a multiscreen cinema operator, also commented on the Plan this way.

¹⁷ Apart from London First, the capital's representative organisation, all constituted individual companies.

obligation to ensure varying interests are present, but the issue may be one of size. Table 3 below shows the twin features of this, relevant to the EiP.

Table 3: Size Matters in Policy Formation

	Large	Smaller
Organisation	If the priorities of major organisations, such as the GLA and Debenhams coincide, for example in favour of growth, then this will probably be mutually recognisable. If a main priority, resources can be made available to ensure appropriate (tacit) alliances can be formed.	It is much harder for smaller institutions (such as councils and local retail groups) to be aware of their strategic aspirations and come to a position of collective alignment. In the voluntary sector the ability to scale-up organisation is probably weaker.
Communication	Major organisations not only hold advantages of power and data, but also deciding their position can be internalised, whereas combined groups have to go through a more public and ad hoc process. Well formed collective positions are easier to articulate.	As available places at the EiP were very limited, reliance is placed on representative organisations. The overwhelming majority of LPAs depended on the collective voice of the Association of London Government, despite their huge economic and political heterogeneity across the city. ¹⁸

As detailed in the table, major companies have lesser difficulties in articulating an agreed line. Thornley *et al* (2005) demonstrated business interests used this advantage well in capturing the agenda of the whole GLA group, whereas the Mayor openly admitted community representations are often ineffectual. Evidence in *Behind Closed Doors* shows the present office holder set out with a deliberately positive position in relation to receiving representations from developers (London Assembly, 2002). This study finds corporate interests were clearly at play, consistent with the overall accommodation of Global City growth in the London Plan's spatial strategy.

¹⁸ Other non-business voices, may find it even harder to form and effectively use joint representative groups given their lower profile and less distinct definition than councils.

Summary

From this section there is information suggesting metropolitan town centres policy formation attracts the attention of many interested parties, particularly developers. Evidence here shows access to this may not be equal, however. Although other tiers of government are well-placed to force some alterations, this did not ensure discussion about alternative approaches to fundamental town centre choices. In the absence of guidance on the inter-related future of London's town centres, the hierarchy was retained despite losing its element of policy application.

9. The White City Centre

The White City Centre, Shepherd's Bush was chosen as an illustrative case of a large, complex redevelopment in a town centre. It was selected on the basis of its size, location and long gestation. These mean that it: holds a metropolitan significance, is in a critical inner London position (but outside of the established central London retail focus of the West End), and also that the scheme has evolved in response to retail change, respectively. Moreover, it was the first site to come forward for regeneration in the White City Opportunity Area, one of the favoured locations in the London Plan for intensive redevelopment to meet growth demands (see GLA, 2004).

This development serves as an intensive study of relations and policy in practice¹⁹, as it is a major scheme but has been supported by the LPA, whereas London-wide planners have historically been sceptical. This section provides an overview of the scheme in order to consider the perceptions of planning professionals and the major metropolitan retail planning issues it raises.

Research sources are synthesised to give insight. Evaluation of public policy formation processes through consultation exercises is revealing, but the study also draws from interviews where appropriate. This demonstrates the active 'positioning' of an array of stakeholders, as well influential factors within planning authorities.

9.1 Site Setting and Developer Proposals

This section sets the shopping context for White City, and outlines some of the consequences in terms of negotiating positions and planning of a local lack of positive planning policy. The detail of the policy formation and interaction of parties is set out within Appendix B.

Retail and Leisure Provision and London Town Centre Change

The White City Centre is a retail-led redevelopment of brownfield land in West London (Figure 3). Lying between Holland Park roundabout and Wood Lane (intersecting with the A40 Westway), the local planning authority (LPA) is the London Borough of Hammersmith

¹⁹ From a methodological perspective, it is best categorised as an 'extreme' case given its scale, and the relatively unplanned nature for a contemporary scheme of this magnitude.

& Fulham. The Centre has permissions for up to 111,480sqm of shops, plus a range of additional land uses and town centre facilities (Renselar, 2006).

White City will essentially be very modern, large shopping centre with many other associated commercial and community uses. With total floorspace of over 150,000sqm, White City will be competing with the largest regional centres in the country such as Bluewater. As Table 4 shows, it is expected to be in the top ten London retail locations by turnover.

Table 4: Projected Change in Competing Retail Centres

<i>Centre Name</i>	<i>London Plan Town Centre Category</i>	<i>Rank 2016</i>	<i>Change in rank since 2001</i>	<i>Growth type description</i>
The West End	“International”	1	0	Incremental
Knightsbridge	“International”	2	0	Limited
Bromley	“Metropolitan”	7	-4	Limited
Kingston	“Metropolitan”	4	0	Suburban expansionism
Croydon	“Metropolitan”	3	+2	Suburban expansionism
Brent Cross	Unclassified	5	+1	Privately initiated
Purley Way (Croydon)	Unclassified	9	-2	Limited
Kensington High Street	“Major”	10	-2	Limited
Stratford	“Major”	6	+17	Planning initiated
White City	(Shepherd’s Bush currently “District”)	8	+?? (Currently unranked)	Privately initiated

Source: Adapted from Experian (2004, Table 25).

Table 4 shows the top projected retail destinations in 2016, descending in order of performance in 2001. White City will promote its town centre to 8th in London on this basis. It is competing against other sites of major investment, including council agreed improvements to the some of the biggest suburban centres. White City is within inner London, but as seen in the table, major town centre redevelopment is also relevant to

outer London. These changes mean places without planned town centre growth such as High Street Kensington, will slide down the ranking, whereas the biggest central London shopping areas prove more resilient to the increased competition.

Tracing the evolution of planning permissions, Chelsfield PLC submitted most of the substantive applications to date, but White City is now owned by Westfield Shoppingtowns Ltd (an international company with experience of developing major shopping malls in places such as Australia). This change in ownership has led to new architects and substantial internal revisions to enlarge net trading space. Westfield are emphasising the need for amendments to meet current retailer requirements on a concept for the site that is now over a decade old. This involves utilising the flexibility of the outline permissions and building in a more diverse mix of uses and operators. White City now aims to be the first shopping centre based major retail development to win upmarket trade, in addition to 'middle market' shopping, by exploiting the demographic profile of the central and west London catchment with a "specialist quarter" of boutiques (McClary, 2006: 29).

White City has diversified away from originally a basic shopping centre. In order to lengthen the stay of shoppers, the range of leisure facilities has been expanded to complement the major recreation facilities outlined below (Table 5).

Table 5: White City Centre Features

Uses in the scheme will include:

- Over 250 shop units, including four department store anchors in each corner of the centre. Marks & Spencer is the only publicly confirmed trader so far, but all the other major national operators been connected with discussions over the department stores
- A multi-screen cinema and the borough's first bowling alley.
- A replacement Shepherd's Bush Library for the ageing building off site.
- Related housing provision, with some on site affordable housing as a buffer to existing residential properties, plus off site key worker provision.
- A crèche for shoppers to use.
- New tube, railway and bus stations. This will provide a Hammersmith & City line stop adjacent to the existing Central line White City station. The new overland railway station will be served by the West London line, and will form a transport interchange by Holland Park roundabout. Shepherd's Bush will gain a bus station here and new services.

It can be seen, on the basis of the extent of the facilities, that the White City Centre effectively constitutes a town centre in its own right. However, it has gained permission on the back of the existing town centre of Shepherd's Bush.

Evaluation of Influences

The general location of the development can be identified as arising from the amount of available consumer expenditure. Figure 4 shows White City's primary catchment. It is at the heart of a dense part of inner and west London, containing some very affluent areas. This provides a strong profit motive for retail development, but also demands developers seek to maximise the commercial potential of the site.

New site owner Westfield have applied their global experience to expand White City in size and scope. In planning terms this has been largely permissible due to the extension of the Shepherd's Bush town centre boundary. Close examination of the policy formation process (in Appendix B) shows the developer heavily involved in this change. This amendment released Westfield from many of the obligations of showing lack of detrimental impact. It also avoided evaluation of the increasingly direct challenge to the existing town centre as the uses within the proposals grew ever broader. Appendix B found the council then ducked attempts to tighten the opened-end policy commitment in favour of the proposals.

Interviews undertaken for this study discussed this major redevelopment with local and London-based planners (see Appendix C). The LPA planner interviewed emphasised the merits of improvements secured in connections to Shepherd's Bush. More fundamentally though, the impression gained was a view of officer concern about the lack of grounds on which to control the development (given the initial broad fit with aims of national policy to support central area investment, and the support of local politicians). The evidence base to the contrary was not available as the council has never undertaken a retail needs study. This has put them in an increasingly vulnerable position to further applications, for as detailed in Appendix C, the system requires that positive aspirations should be underpinned by an empirically sound base.

Council members and officers saw the development as delivering 'regeneration' in an area of the borough traditionally short on investment (see LBHF, 2003). With this belief, and no regard to appropriateness of scale, a small local council sought to plan a metropolitan

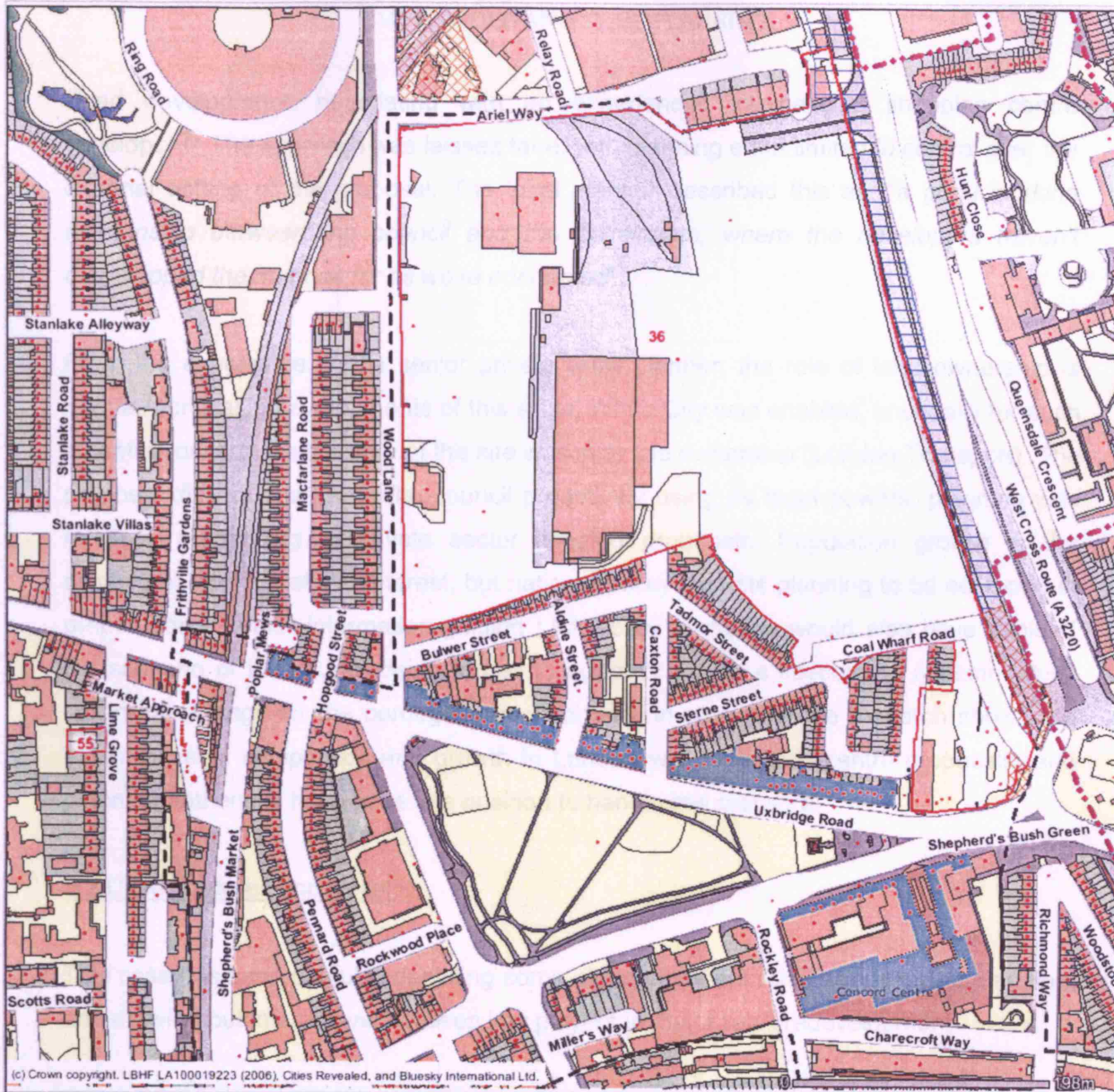


Figure 3: Local Setting of The White City Centre (UDP Site 36: red boundary)
 Located between Wood Lane and White City (including the BBC) to the west, and the West Cross Route and Holland Park area to the east.

Shepherd's Bush Town Centre boundary (extended) shown in broken black lines.
 'Prime Retail Frontage' on Uxbridge Road/existing shopping centre shown in turquoise.

Source: Extracted from LBHF (2003).

sized development, negotiating with an experienced international shopping centre developer.²⁰ The approach was laissez faire, with planning effort limited to control over the external setting of the proposal. The local planner described this as: *“a good working relationship between the council and the developers, where the developers haven’t overstepped the mark as far as we’re concerned”*.

From the experience of the senior private retail planner, the role of land ownership is normally critical in developments of this scale. White City was enabled, unusually for such a central location, as the core of the site was in single ownership (London Transport). The proposal did not arise from the council proactively using its legal powers; planning was reactive, responding to private sector initiated proposals. Population growth in the catchment attracts retailer interest, but national policy expects planning to be equipped in preparation. Greater information guiding LPA policy formation would also have avoided the scenario of the council being forced to adopt or refuse a speculative scheme whilst lacking a strategy for the borough’s town centres. In summary, the research shows the extent of retail competition and growth in London will drive town centre proposals, and planning authorities have to be in a position to handle this pressure.

9.2 Case Features and Results

This case has been useful in depicting some of the dominant retail trends facing planning, and drawing out interactions between key players in major retail redevelopment.

Planning Changes and the Key Parties

White City shows the definition of a ‘town centre’ is not always consistent or simple. Yet although preferable, a town centre location is no longer automatically sufficient to get permission in national policy (see Appendix B). Even more clearly, it shows the increasing complexity of what is seen as ‘shopping’ in a viable commercial operation, in a very dynamic retail property market. This case highlights the diversification of high street activity.

The difference the developer makes is shown by these major format alterations to ‘update’ the scheme once Westfield Shoppingtowns took ownership. Table 6 draws out

²⁰ The government’s option of ‘calling-in’ the original planning application for scrutiny was not exercised, once the council accepted the case made for town centre vitality and viability. The principle was deemed settled prior to the GLA’s formation.

**WHITE CITY -
A PLANNING
APPLICATION BY
CHELSFIELD PLC**

**LOCATION OF CENTRES
CONSIDERED AS PART OF
RETAIL IMPACT ASSESSMENT**

KEY:

APPLICATION SITE

ISOCHRONE DRIVETIMES

SURVEY ZONES

REGIONAL CENTRE
Brent Cross

INTERNATIONAL CENTRES
1. West End
2. Knightsbridge

METROPOLITAN CENTRES
1. Ealing comprising: Ealing Broadway (1a)
West Ealing (1b)

MAJOR CENTRES

1. Hammersmith
2. Fulham - North End Road
3. Chiswick
4. Putney
5. Wandsworth High Street
6. Kensington High Street
7. Wembley
8. Kilburn
9. Richmond
10. Clapham Town
11. Clapham Junction

DISTRICT CENTRES

1. Shepherds Bush
2. Notting Hill Gate
3. Acton
4. Harlesden
5. Kings Road East/West

Not To Scale

Date June 2000

North ↑

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**MONTAGU
EVANS**

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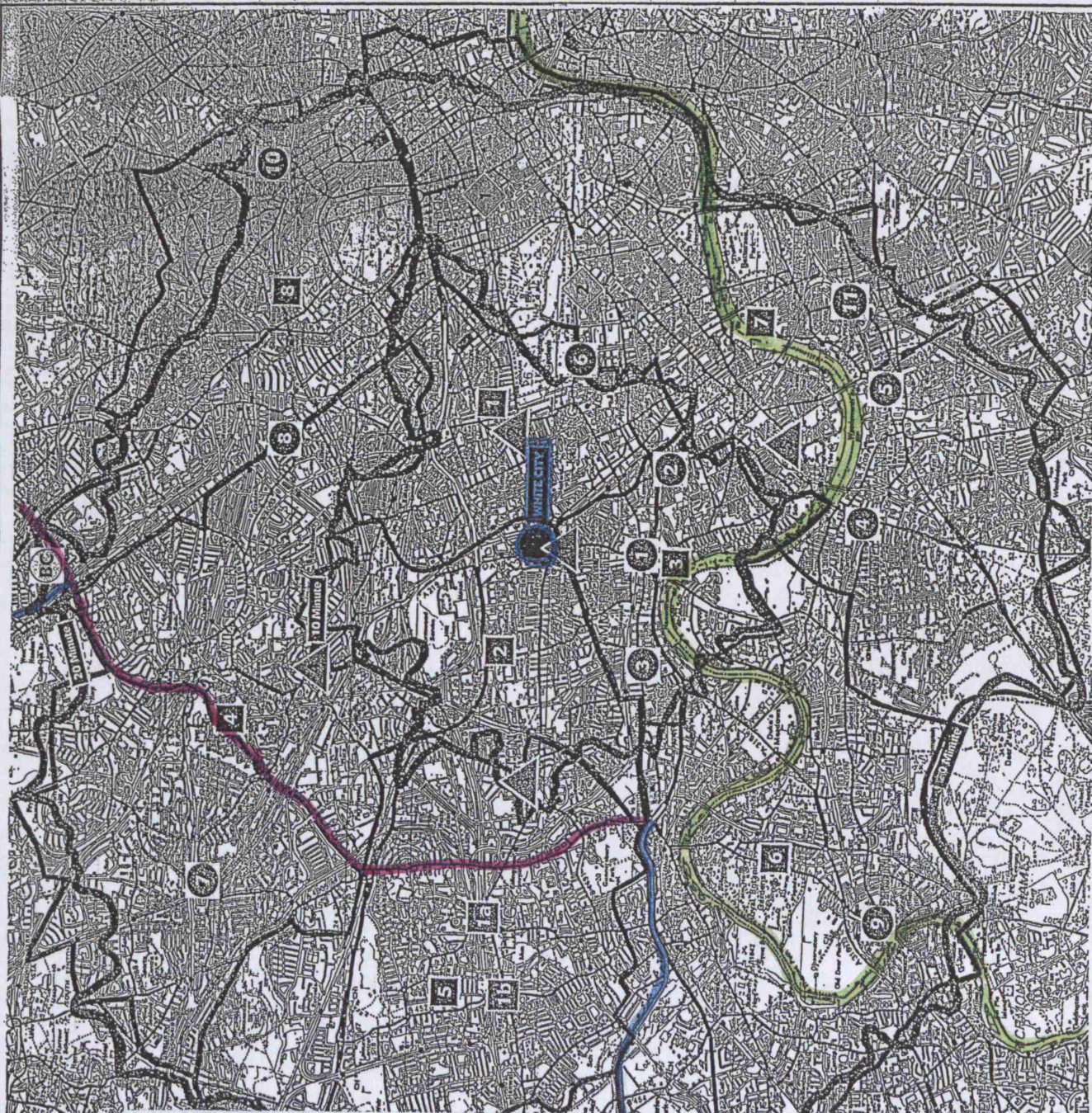


Figure 4: The White City Centre's Metropolitan Catchment (Montagu Evans, 2000)

White City's location is expected to allow a penetration of all of central and west London potential consumer markets.

This diagram reproduced in a developer's recent planning application, shows that in addition to the new railway stations, road transport links will ensure it is a short drive from the North Circular Route (pink) and motorways, such as the M4 (blue).

implications of the above issues against some of the major dynamic factors observed within White City.

Table 6: Implications of Dynamic White City Centre Factors

	<i>Note</i>	<i>LPA implications</i>	<i>GLA implications</i>
UDP review (Appendix B)	The White City Centre was not a plan-led development, although the borough has used the development plan to facilitate its materialisation.	This provided full leeway, with a general positive policy ('SBTC6: Site 36'), but without qualifications.	A policy vacuum arose for this form of development because of the limited London Plan retail coverage.
London Plan introduced	Most significantly, sets overall 'pro-development' context.	This proved amenable to local parties, and dampened potential conflict.	The overall approach to metropolitan growth dictates the terrain of major pan-London partnerships.
PPS6 issued	The primary planning policy issue facing White City is one of scale in relation to the existing town centre. This internal aspect this is a new frontier in town centres strategy (Appendix B).	The increasing prescription and data requirements forced a decision -whether to openly support the development.	The PPS6 amendments made it more apparent that the London Plan contained no regional strategy as expected, highlighting the lack of alternative plans to this proposal.
Retail change	As well as increased leisure/shopping, in terms of specific retail trends for policy, The White City Centre shows the investor focus on central, but large-scale, redevelopments – exemplifying growing polarisation of centres.	The council gave flexibility in original permissions for a range of other use than retail alone. This may impinge upon their primary retail planning concern: the viability of other local town centres. These smaller centres struggle to attract speculative investment.	Polarisation allows some cover to focus on favoured 'strategic' developments. This allows regional planners to orchestrate these individually rather than set an overall basic spatial framework for growth. This fits in with the close but informal negotiating approach of the Mayor.
Developer change	The larger developer (Westfield Shoppingtowns) switched the terms of agreement to a more ambitious aim of replicating rather than complementing the existing town centre.	The council's influence waned as Westfield inherited a premier negotiating position, which they are currently seeking to exploit.	The particular new developer revealed how bound up in pan-London politics major central developments can be. The GLA are engaged with Westfield, in their flagship scheme at Stratford, east London.

Summary Insights

Developers have been the primary influence over White City. This case briefing shows they have managed a slow but productive relationship with the council. The new owners have begun to impart their vision on the scheme. It is viewed planning had relatively limited impact, other than national policy redirecting major investment back to central areas. It modified scheme design, but perhaps was more important in negotiating the supporting infrastructure required to serve the White City Centre. When asked about the single most influential party, the local planner identified senior Labour members, for employment generation reasons. Accordingly, planning policy specifically support of the scheme has contributed to councillors leading local opinion²¹ rather than reflecting it.

The significance of the informal partnership between the council and developer is evident from documentary analysis of policies. It appears the relationship has been largely one-way²², as the lack of confidence of LPA planners in the ideas and data at their disposal allowed the initial acceptance of a shopping centre in principle gain undue dominance. It is still too early for any study of the direct impact of the GLA on the inception and realisation of a whole large scheme. However the private consultant pointed to different hurdles to be met, whereas the local planner spoke of *“the GLA’s longstanding concerns about the site”*. Interviewees were unanimous that the Mayor would have looked to exert significant influence over any development of this size and profitability.

Within this study’s focus on sub-national planning decision taking, this development was clearly locally (council executive) led, although the research shows this may be a result of manoeuvring by the developers. The council, for the first time in many years has been involved in some small Compulsory Purchases to secure the scheme. Yet as seen from the scrutiny of plan formation, the LPA failed to utilise its statutory policy powers properly in pursuit of genuine and balanced spatial planning objectives (as opposed to promoting property investment). Greater regional perspectives could have offered benefits. Planners would have been better informed on technical evidence and (alliances aside) held a stronger negotiating line than the LPA offered.

²¹ The public appears indifferent to the scheme. In terms of their role as consumers, whilst a commercial demand exists, no representations on the scheme overall were found from planning policy. Recent consultations in response to details applications also attracted minimal response (Renselar, 2006). In terms of voting, cursory examination of the borough elections of 2006, does not indicate any significant interest in this, the largest site in the sub-region.

²² Legal requirements and finance are clearly significant in setting the parameters of engagement. In terms of resources, the Section 106 agreements have resources a variety of initiatives in the borough, for example

This case outline has briefly illustrated some of the main themes arising from major town centre developments, such as the balance of power in partnerships and negotiation. It has also highlighted some of the complexities of this process, which shields private investment from public scrutiny and input. Finally, it depicts the trends of evolving national policy and retail change such as increasing emphasis on technical justifications to ensure retail expansion is delivered, and shop diversification (respectively); and also how local planners approached problems of delivering this growth.

Shepherd's Bush Green where the council was struggling to provide direct support for the major remodelling project.

DISCUSSION

“There is a danger that in the local level, we are simply enshrining established hierarchies forever-and-a-day, because nobody’s got the ability at local level to plan or elevate (or in some cases, demote) centres.”

Planning Partner responsible for town centres and retail at the West End office of a national property consultancy: Interview March 2006.

10. The Modes of Influence of Significant Retail Planning Stakeholders

- 10.1 Involved Parties External to Sub-National Town Centres Regulation
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- 11.1 Implications of Developer Influence
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Note:

APPENDIX B (The Paths to Present Policy, and White City Formation of Positions)

APPENDIX C (Interview Preparation, Content Analysis, Summary Points, and Transcripts)

10. The Modes of Influence of Significant Retail Planning Stakeholders

This chapter incorporates the findings of the in-depth interviews with the West End Partner (WEP) at the major planning consultancy, the Senior Strategic Planner (SSP) at the GLA, and the Assistant Director (AD) in charge of planning at Hammersmith & Fulham council. It draws heavily from the detailed assessment in Appendix C. This is combined with the findings from the policy analysis and the development case in order to discuss how key players act in governing and delivering town centre change in London. In order to examine the approach of those charged with directly making major retail planning decisions, the first section breaks down the shaping interest of other major institutions such as national government and large retailers and their professional agents. For convenience, a basic summary of main points is provided at the end of the chapter.

10.1 Involved Parties External to Sub-National Town Centres Regulation

Pressures on local and regional retail planning bodies have been shown to often arise from forces outside these institutions. Notably central government and the private sector (especially retailing corporations and their agents) aim to influence town centre planning. They recognise the context for planning decisions as a administrative procedure, and as a discretionary professional judgement heavily informed by notions of commercial distribution. These related phenomena are depicted in Table 7. With connections within columns and rows the categorisation of observed outcomes has an arbitrary element, but it draws out themes to consider institutions bestowed with the responsibilities of determining retail planning policy and applications.

Table 7: Thematic Influences Over Sub-National Retail Planners

Parameter	<u>Central Government</u>	<u>Private Sector</u>
<i>Means of hold over town centres planning processes</i>	<ul style="list-style-type: none"> • Administrative Continuity <p>An incisive form of practical intervention in major retail development is the way central government acts to ensure the process continues, albeit slowly. Its London arm, GOL, is active, and perhaps even more necessary since the GLA role commenced. Interviewees regarded it in terms of ‘filling in’ given local planning capacity, but it also works with the ambitious regional government to assess and direct LPAs, whilst moderating between the two layers.</p> <p>Central government will continue to be implicated in regional planning as it is seen as the only possible substantial forum of arbitration. The private consultant held the view “<i>you are going to need that safeguarding role of GOL</i>” (WEP) despite a separate regional government, welcoming the additional supporting scaffolding. This suggests the structure of responsibilities, for which national government is ultimately responsible, functions inadequately .</p> <ul style="list-style-type: none"> • Legislative Prescription <p>Incremental expansion of policy has been accepted, helping central control permeate relatively unchallenged through retail planning procedures and institutions. This absolute move can be seen in the low-key expansion of demands in PPS6. As planners at the heart of the process, the interviewees held no fundamental objections to the policy position, interpreting an acknowledgement of the contribution of their employment position.</p>	<ul style="list-style-type: none"> • Organised Above Consumers <p>The GLA planner in particular emphasised the sovereign consumer’s influence on London retailing, but paradoxically was most in favour of a pure application of PPS6’s approach of comprehensive need assessments on behalf of shoppers. Interestingly, a report for the Mayor depicted the imperative of “addressing consumers’ <i>latent</i> needs” (OIRM, 2006: 47, emphasis added). Thus residents as consumers may not exert much leverage over major town centre choices (if demand can be managed and retail choices are only within a given menu of products).</p> <p>If this is the case, and LPAs also act with minimal capacity, then planning by the Mayor for major retailers can partake in a ‘corporatist pact’ that bypasses the consumer in shop provision, let alone future options for the town. Regional planning can form a commercially efficient level to organise retail supply, for those who can gain access.</p> <ul style="list-style-type: none"> • Business Flexibility <p>Retailers play a substantial role in aggregate, not least through defining possibilities for a town. Developers are therefore in a pivotal negotiating position. Evidence from White City shows adaptability in positioning. Partnerships can be reformed until planning permission is secured/Section 106 contribution agreed. The private sector WEP highlighted options in the system for an application driven process, or for collaborative policy-led planning.</p>

	Central Government	Private Sector
<p><i>Command over the planning profession's general capacity to implement public policy</i></p>	<ul style="list-style-type: none"> Intervention Rationale <p>Old controversies can still loom large in the mind of the experienced professional, given the balanced settlement between corporate private and public sector interests that PPS6 represents. The ability of the LPA planner is constricted when he is worried about the local scope for action given “<i>all sorts of issues about the extent to which planning should or should not be involved in competition.</i>” (AD).</p> <p>PPS6 heavily implies intervention in competitive markets, but in the name of supporting private interests best able to improve the town centre. However, this nuance has to be widely appreciated, otherwise it can impinge on the confidence of planners to deliver this agreed positive approach.</p> Conceptual Reliance <p>Views differed between the experienced local officer and the expert consultant as to how much more ‘aspirational’ PPS6 could/should be. The private specialist (WEP) had some personal ideas of possible modifications, whereas the AD’s needs were more in relation to clarification of existing stipulations.</p> <p>The challenge for planners is avoid dependency on whatever form of town centre thinking is disseminated from above. Greater transparency may resist loose application of concepts to local environments, in this way.</p> 	<ul style="list-style-type: none"> Indirect Resource <p>If longer-term partnerships can be maintained, specialists with capital are well placed to gradually displace outside sources of financial and technical input. This taps into any local aspects of retail planning dependency on outside leadership. With outline permission such as at White City (or elsewhere with the tacit support from the Mayor), this hold helps amendments be negotiated from an established position.</p> Data Holding <p>Retail information is held within private organisations, and only selectively released to planning agents and authorities determining applications. The private planning expert (WEP) discussed how this can undermine the evidence base available to decision makers for specific decisions. But the ramifications may be more substantial in the longer-term.</p> <p>Objectives have to be negotiated with retailers for town centre growth to materialise, but planning decisions should be informed by the detailed turnover and floorspace trading data retailers hold. This may be restricted by ‘commercial sensitivity’ claims about information; for fairness there may be a case for increased public intervention in this respect.</p>

Central Government

The direction behind the future of any town centre remains highly centralised within government, despite the role of town centres as a local urban focal point. Putting town

centres first should in itself be potentially locally empowering in increasing the range of options, if consensus leads to a successful centre. However central direction it has been associated with increasing prescription, from the culmination of the political direction of flow over the last decade. Therefore the central element is possibly even more influential, and it has to be explicitly drawn out in any such study of sub-national responsibilities.

Table 7 showed how planners in sub-national authorities struggle to apply national retail policy and practices. Central government watches over their decisions.²³ Planners, from their individual positions seek freedom to apply PPS6 on the basis of their own circumstances. However it has to be questioned whether these two features are compatible –is any original sub-national strategy formed with central reinforcement of orthodoxies in thinking about retail distribution.

Central government introduced major changes in the structure of development plans in the 2004 Act. LPAs have to grapple with these new demands, as town centre change should be plan-led, putting increased pressure on planners. The private sector planner thus argues: *“the acid test of the new system is not so much whether the framework is up to it but whether the resource base and skill sets are there.”* It is this latter aspect, the mental flexibility of retail planners that this study has increasingly identified. In summary, the other main finding about central government is its role in keeping the retail planning moving. This is seen as necessary because of concerns if LPAs are forward thinking enough to appreciate and implement new national policy.

Consumers and the Development Industry

Many non-government groups or individuals are interested in town centre change. The three planners talked as if retail regulation requires validation from the shoppers. In contrast, the actions of planning policy makers and the information sought in support of these, can fail to explicitly relate to the general public. This study has found suggestions of the limited relevance in retail planning of ‘consumer choice’, and accordingly most of this evaluation is on the organised private sector, large retailers and experienced developers.

²³ GOL is an arm of central government, so although concerned with London, the Government Office is addressed in this section. Regional government is evaluated as constituting the GLA family under the Mayor of London.

The planners interviewed appreciate the influence of business interests. The agenda of department stores or multiple variety chains²⁴ will impact on the perceptions of any town centre, as confirmed by the WEP consultant. Commercial expertise can be applied to sell the principle of a scheme. Typically this can involve trading-off different planning levels. In a locally-tailored pitch: emphasising town profile raising or local employment generating, drawing from fears of place competition. Alternatively the Mayor of London can be made to appreciate how retailing can cross-subsidise desired growth, for example affordable housing in mixed use schemes or provision of transport improvements. With a growing dominance, the developer can then threaten or covertly explore the option of an alternative alliance. There is scope in the absence of public accountability for companies to adopt an expedient development strategy. Yet within the different parts of government accountability may vary, as the implications of town centre decisions are felt more directly at certain levels than others.

In summary, this research has found clear means through which large developers can be potentially very powerful in major town centre redevelopment. This study suggests residents should be sceptical about their own influence in this respect, especially as individual consumers. Large commercial institutions can retain spatial options, whilst still flexible to arrange specialist industry to pursue their locational strategy. This section has explored how these parts of the private sector become involved in planning the sub-national terrain, whilst from the other angle central government can enforce both policy and the structure it favours, using the national state apparatus.

10.2 The Regional Government in London

The key themes that form external pressures provide a basis for analysing the Mayor and his planners' application of the London Plan in managing metropolitan growth.

Metropolitan Growth Agenda

The impact of the new structure for London governance is still working through, however the Mayor is pushing forward with a review of the London Plan (GLA, 2006). Moreover the government is minded to reward him with further responsibilities reaching deep in to many aspects of planning. In brief, it must be highlighted this may reflect perceptions of recent

²⁴ Developers represent retailers but will only tailor specific shop formats and for a minority of large chains. Supermarket requirements will be directly incorporated within development decisions because of the duopoly of the market. Town centre comparison based retail has possibly less dominance but is highly polarised, and the premium placed on securing a prestigious anchor store in any major town centre development exacerbates this.

outputs in the aggregate delivery of growth in London. Critically, this is informed by the government's highly pragmatic interest in the immediate outcomes, for example uplift in the housing aggregate pipeline. This is instead of representing a proven structure whereby the strategic capacity of planning as a whole has been upgraded, or judged on retail performance. Thus it is not based on a sectorally integrated assessment.

The interviews drew out the single most significant impact of the London Plan for town centre redevelopment –the expectation for growth to be accommodated. This is in full accordance with PPS6, but in many respects the spirit of this has been taken to the extreme, bypassing local verification of the demand for town centres. The housing and employment growth figures specified by the London Plan have high levels of retail need as their corollary²⁵. Consequently, regionally there is no distinct retail sector strategy, rather an economic strategy with substantial outcomes for London's town centres. This derives from the primary themes from central government's organisation of retail planning, as shown in Table 7.

The London Plan is still seeking to isolate a current town centres 'template', to attempt to form a sufficient spatial perception of ideal commercial locations upon which growth can be planned. As the WEP private sector planner opined: *"what has actually happened in practice has been a post-hoc rationalisation of a number of schemes that in effect had their origins pre London Plan."* Not a great deal of coordination can take place whilst this reconciliation and adjustment to the 'planning inheritance' is taking place, other than favouring certain sub-regions. However across the city the GLA has to lay claim to larger, or nominally 'strategic,' locations, and the established or best-connected commercial areas are a logical choice. Vertically prioritising places defines responsibilities, and may be a clue to the enduring use of a hierarchy. Planners accept strategy and look for structure, including at LPA level: *"looking at town centres in London, say at the top of the hierarchy, there ought to be some coordination"* (AD). The principle of purposeful and sensitive orchestration of major town centre development across the metropolis is accepted, but the interviews showed this generally has not been viewed by planners as evident to date.

The GLA planner saw the organisation as leading London's town centres through this indirect economic growth impetus. He was clear in the role of retail planning. The tests are: *"has it improved choice for consumers, has it maintained or improved*

²⁵ This is in the absence of either negative change in consumer expenditure or agreement by the private sector that retail productivity (sales by floorspace) is higher than the last published figure from 1971.

competitiveness within London's retail market, has it improved the vitality and viability of the town centres?" (SSP). This commercial slant was seen as manifested in planning through delivering regeneration by anti-(absolute) decentralisation channelling. This is dependent more on development control powers, rather than articulating policy options, which is the domain where the Mayor is statutorily best placed to act.

The city growth agenda has been delivered by enforcing a degree of prescription, such as on the mix of uses on individual applications. The confidence to intervene above and beyond the clearly demarcated responsibilities can be attributed to the ebullience of a new institution, allied with the personal political fortunes of the Mayor. Consideration of White City largely escaped this period, but the LPA AD was wary of their interventionist approach, highlighting the rationale for regional coordination in other aspects, such as infrastructure. Intervention has distracted from a pathfinding role in defining the future of town centres, where the private sector retail specialist regarded the undoubted capacity of the GLA (in his view) should be applied. Instead, whoever is to blame, the policy outcome is more prosaic: *"you tend to get fairly bland, generic policies, applied at regional level – which often say little more than PPS6"* (WEP consultant).²⁶

Orchestrated Access

Another way the Mayor delivers his agenda through town centres, is by presenting the regional authority as the single clear forum in which all stakeholders engage. This is partly possible as it is sandwiched between national and local levels, but a high profile has been maintained (and controversy helps draw out interests). All the parties the Mayor needs are engaged, subscribing – willing or otherwise – to the significance of pan-London governance, and the interview revealed how the Mayor can claim to represent most other residual bodies through his mandate. The private WEP presented the positive aspect of this:

"the London Plan has imposed or established a network or hierarchy for centres that is understood. So it has provided a means for assessing cross-borough the role of different centres, [the] network of Major/Metropolitan centres. I think it has provided the vehicle to deliver London-wide views..."

However as seen in the evolution of the London Plan, another side of this is how closely it brings large business interests – who only tend to engage with LPAs at application stage – together with the Mayor.

²⁶ The GLA interviewee also saw the ability of his employer in information research and dissemination as powerful, but this was expressed in terms of governing over LPAs.

The study shows the coordinating role of the GLA is not much about balancing the growth of individual town centres to ensure appropriate specialisation (as part of moving towards a desired network). There is no retail vision to pursue. London's government is still adjusting to recent changes, and relationships are formed ahead of new ideas. In summary, the research shows the regional level is an expedient forum for major redevelopment decisions. Yet as highlighted by interviewees, there is no confidence by planners that coordination takes place strategically, as opposed to 'structured ad hoc' planning control.

The joined-up element of concern to the Mayor is the composition of major schemes, ensuring they contribute towards his primary goals e.g. housing provision in central locations, final contributions towards transport etc. This plays to the GLA's strengths or brings on board other powerful interests. This may represent greater joined-up action than isolated thinking about retail, but until it appreciates the significantly sub-regional element most town centres can serve (and the aspects of community identity thereby constituted) it will continue to fall short of its potential. Alternatively, the GLA has not helped explore if integrated proactive planning could deliver a move towards sensitive and negotiated local goals.

10.3 London Local Government

Evidence illustrating the constraints on London local planning authorities in major town centre decisions is synthesised below, covering both political forces and administrative realities.

Reactionary Imperatives

The leadership role of the local authority in the White City Centre was essentially secondary. In a development as significant as this, it suggests - as was strongly confirmed through the discussion with the key officer at the council - the LPA was uncertain of their own actual and desired rationale for intervention. *"It can be very difficult for local authorities to know how far it is possible to go with what might be done...."* (LPA AD). This arises from the struggle to reconcile the competing pressures jousting to capture its potential influence. Undoubtedly, LPAs remain highly significant in town centre redevelopments, for the very reason they are the Planning Authority with primary powers of determination of applications.²⁷ This is more significant than it first seems given the

²⁷ In London however this has begun to be eroded, and is now set to be substantially undermined, by the central government's redistribution of powers to the Mayor.

assumption that lower level authorities are set up to be policy implementation focused²⁸ for reasons revealed by the discussions with the selection of planners. The interviews highlight problems in strategic planning capacity within London's current version of decision making 'subsidiarity', and council self-doubts. If this system for a plan-led approach therefore struggles, development control functions are significant as a default mechanism where critical choices have to be taken. This measure can be pursued and utilised by the development industry (as highlighted by the private sector WEP planner in previous attempts to expand Brent Cross, and at White City). In order to apply this strategy to gain planning permission, developers can select from the four themes of influence identified in Table 7.

Councils can claim to govern over major retail proposals on the basis of local responsiveness. In town centres redevelopment this is likely to be a reaction to powerful property market forces. Although in everyday functioning, the corporate council rationale through which LPAs justify their planning powers is another mandate. This arises from a stated closeness to their electorate; whereas the Mayor of London seems more engaged with business requirements, for example.

The AD highlighted how individual sites raise controversy²⁹ (and not necessarily in proportion to their scale) rather than the direction of change in the local town centre. This can be related to how selected groups – normally defined in relation to a specific interest or neighbourhood – may be better organised in terms of communication channels to the executive councillors or senior officers where power is increasingly concentrated in London Boroughs, rather than necessarily participating with the tier where the most significant options are defined. This selective input³⁰ can embed a reactive disposition; arising in the absence of effective counterbalancing organisations (for example representing workers or employers in that area). This reinforces growth blocking groups in such 'institutionally thin' urban economies (see Amin, 1999), who can exploit increased participation planning decisions.

²⁸ Although as Taylor (1998) explores this invites controversy in action-focused planning, as national town centres policy expects.

²⁹ The imminent 2006 London Borough elections were not raised by the LPA planner in this respect; and given the much greater aggregation on a regional scale, influence by voters seems even more improbable at this scale.

³⁰ It is not necessarily in the council's interests, at a time when London Boroughs are required to justify their existence, for a more representative stance if this heterogeneity weakens the distinctiveness of their institutional purpose.

In such a situation there is local leadership, but not necessarily a mandate. Thus there can be clear moves forward, but without a destination. As the private sector planner was free to opine: *"the fact of life is that is often easier for a large local authority to take the line of least resistance, which is not to try and take on all those interest groups, not to try and address those difficulties"* (WEP). From this perspective, councils can be associated with a lack of strategic aspirations in planning town centres.

Coping Without Managing

In the face of these conflicting demands an expedient approach is for 'adaptive survival', where low profile influence is exerted over time. This is necessarily reactive, as explicitly volunteered by the LPA officer (AD), rather than positive planning: the GLA SSP saw the lack of site identification in local plans as a primary difficulty in moving forward (despite the Mayor's static hierarchy). Ambitions are not set high, as when the AD articulated the priority concern as to *"keep the [borough's main] town centre going."* This limited horizon does not take the proactive stance of national policy, avoiding the empirical specifications of PPS6. As the consultant said of LPAs: *there are many who don't undertake any form of survey basis, any form of effective forecasting"*. This may not be uniform across authorities, but it could be postulated that incrementalism in retail planning is consistent with weighing up, a phlegmatic professional disposition. Policy making requirements from higher levels of government have to be balanced against uncertainty from fluctuations in commercial demand for town centre locations. Caution may stem from declining confidence in the utility of concepts needed to explain retail location.

The private sector professional had discerned and neatly summarised local government approaches:

"I guess there are some good examples and some very proactive authorities. There are some others that even if they take advice it tends to be much more along the lines of safeguarding the current hierarchy of the status quo and very simplistically assuming that growth in new development will continue to follow a historic hierarchy and will be apportioned based on the current network. Again, simply because in some cases it is just too difficult either intellectually or politically to deal with the concept that the role of centres is changing and some will go up and some will go down." (WEP).

This is the view of one planner, but chimes with the other interviews and is fully consistent the findings of this study.³¹

³¹ Although regularly employed on a pro-development basis, often directly arguing against councils, the Partner had recently advised central government on a major piece of retail planning technical guidance.

A unanimity of interviewee views – with varying degrees of openness – was found believing that LPAs should actively consider facilitating planned town centre changes, if appropriate to meet needs. The private sector WEP asserted: *“local authorities should be the catalysts of bringing forward major town centre redevelopments”*. On this basis the LPA AD planner stressed the necessity of enabling infrastructure. This comment points to issues of sectoral integration, reminding of the role of the town centre as an urban nexus for many uses and not just a ‘retailing repository’. In turn this should include towns as civic entities.

Integrated planning has particular relevance in town centres, especially for practitioners operating in institutions seeking to find new means of articulating their agenda. For retail planning to be positive and sensitive to the non-commercial dimension of town centres, local government can make a distinctive contribution. This may provide means to capture community aspirations for specific town centres, and possibly even refresh local governance.

In summary, this research shows LPAs and their planners may feel more vulnerable than other governmental decision makers. Professional conservatism can be found at this level, but the interviews established a belief that in principle at least (as substantial development control powers remain), local planners should recognise the opportunities of the framework for positive retail planning. Moreover this study shows a prime issue may be ability of planners to utilise the statutory tools at their disposal.

10.4 Influences Overview

In order to help conclude the study, the following table provides a basic summary of the main factors underpinning and constraining how local and regional government in London plans major town centre redevelopment. This outlines, rather than further assesses, the evidence as discussed in the sections above. Table 8 should be considered along with the narrative account, but provides a base for the final chapters.

Table 8: GLA and LPA Overview Points

	<i>Used Influentially:</i>	<i>Limits Influence:</i>
GLA Planners and the Mayor of London	<ol style="list-style-type: none"> 1. Clear overall agenda (pro growth) 2. 'Obvious' forum for metropolitan interests (convenient for larger organisations) 3. Perception by corporations/ Westminster of 'planning delivery' (non-retail sectors) 4. Understanding of 'big business' developer positions (confidential) 5. Assumption of regional as 'natural' level for strategy (planning) 6. Claim to oversee infrastructure provision (subject to resources) 	<ol style="list-style-type: none"> 1. No dynamic regional retail strategy (coordination ignored) 2. Sites of opposition to further planning intervention 3. Potential ramifications of 'corporatist pact' (challenge by excluded private parties) 4. Lack of exploration of retail planning advisory role (versus GOL)
Standard London LPA	<ol style="list-style-type: none"> 1. Guarding of primary development control powers (despite central checks) 2. Stated accountability to electorate (spatial proximity) 3. Phlegmatic professional experience (possibly variable) 	<ol style="list-style-type: none"> 1. Systemic restrictions from higher levels (local aspect neutered) 2. Blocking elites (disproportionate) 3. Politicians with purpose not policy (cross party) 4. Conservatism in retail planning (especially to fresh concepts) 5. Wasted policy ambition in non-retail potential of town centres

11. Underlying Constraints to Identifying and Implementing Agendas

This chapter seeks to take the assessment further, by exploring the structural distinctions in certain institutions that facilitate their engagement in retail planning in set contexts. This is discussed with reference to scale and the rationale underpinning the actions of large organisations or sets of decision takers.

11.1 Implications of Developer Influence

Further consideration of the selected means of participating in retail planning by institutions, has to be set in the context of the scale of operation. From the combined evidence of the research in this study, it is apparent the first question posed from the overall issues, who has been most influential in major town centre redevelopment, strongly hinges on knowledge.

Retail Planning as a Specialism

The difficulties of major redevelopment in London's town centres require specialist understanding, and are normally the preserve of certain developers. Currently, any individual public sector body other than central government is likely to be limited in the depth of experience of such urban change, and still less have a understanding of how to manage it. Sub-national levels of government are wary of its particularities. This reflects that in the field of retail, the planning profession has rarely been certain of exactly how it is going to execute its powers. Planning is implicated in town centre fortunes, but reluctantly. This study shows that this disposition been connected with a reticence to think anew about actual and desired retail location and town centre functions. This reinforces and is enforced by the informational and procedural spheres of influence featured in Table 7.

Institutions are in place to tackle these issues London-wide, but the retail sector has not been a Mayoral priority and this action has not occurred. Instead a period of adjustment is underway, but has failed to generate new ideas that would lead to modern metropolitan retail planning. Emerging work on greater objectivity in defining town centres (see ODPM, 2002) has yet to be addressed, and the hierarchy is still seen vertically despite the possibility of alternative network arrangements, such as by town centre speciality, in polycentric London.

Axioms and Room for Manoeuvre

As much as town centre decisions are determined with reference to a static retail hierarchy, other orthodox notions (for example viability through diversification into leisure uses, and the perils of absolute decentralisation) retain a similar hold over policy. The hold of familiar concepts can be powerful, useful imagery against which variants can be seen. However the applicability of these ideas can be undermined by the dynamic nature of retail, reducing their descriptive value as a base from which choices can be made. As one interviewee believed, planning strategy needs to actively pursue discuss options as feasible alternatives.

The scale of institution points to the difference in defining where problems are more evident. The absence of any distinctly regionally-tailored retail planning strategy in the London Plan, is hidden by the low profile given to exploring the potential specific to individual town centres, and the GLA's premier resources and confidence. Alternatively, councils are always vulnerable to local negative interests in major town centre redevelopments. Technical and resources constraints can form persistent restrictions on LPAs as much as anywhere, but these are convenient for those who are not disposed to the active town centre planning necessary to meet growth within London. Figure 5 depicts an illustrative overview of why this matters, and posits the form of possible variations by scale.

11.2 Outlining Fundamental Causes

It is possible to examine the relationship between key domains involved in the processes of place-based commercial exchange, through considering three spheres around which interests may be formed. This study has not been focused on personal traits, and therefore is centred on the interaction of the aspects of institutions (planning authorities/developers) and places (town centres). It can be seen there are two main links, the left hand connections underlined in the diagram. These are labelled c and 3, for the spatial strategy (closely analysed in planning research such as this); and the need for legitimisation i.e. maintaining democratic rule, set in a capitalist society (organised in the name of place or territorially) respectively.

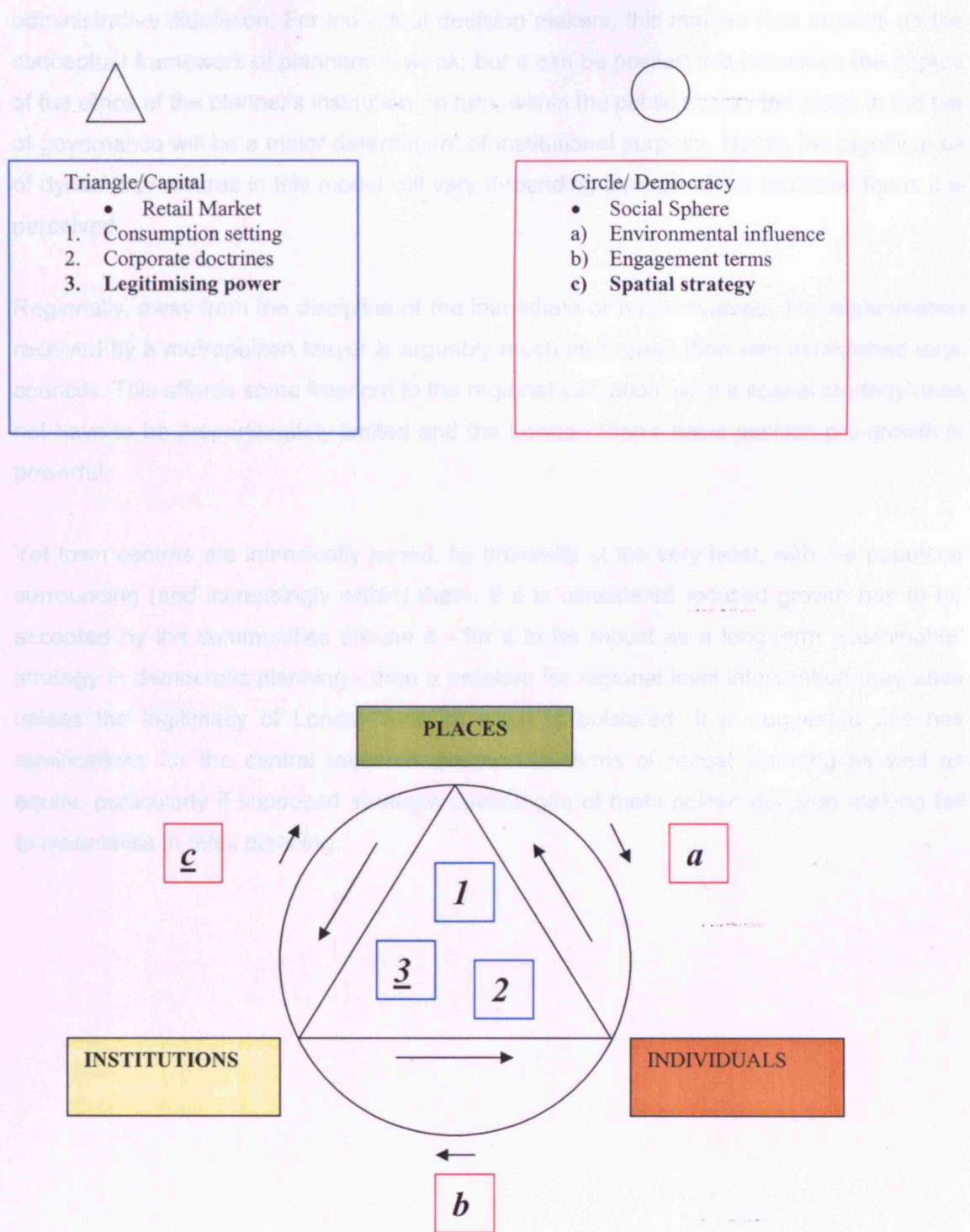


Figure 5: Fundamental Planning Relationships Between Places and Institutions

Tewdwr Jones (2002) demonstrated how the terms set by central government in a planned statutory planning system have reduced professional discretion in favour of

administrative discretion. For individual decision makers, this matters less in retail as the conceptual framework of planners is weak; but it can be posited this increases the imprint of the ethos of the planner's institution. In turn, within the public sector, the place in the tier of governance will be a major determinant of institutional purpose. Hence the significance of dynamic pressures in this model will vary depending through which territorial focus it is perceived.

Regionally, away from the discipline of the immediate or national levels, the legitimisation received by a metropolitan Mayor is arguably much less direct than well-established local councils. This affords some freedom to the regional institution, as the spatial strategy does not have to be proportionately limited and the London Plan's basic position pro-growth is powerful.

Yet town centres are intrinsically joined, by proximity at the very least, with the populace surrounding (and increasingly within) them. If it is considered focused growth has to be accepted by the communities around it - for it to be robust as a long-term 'sustainable' strategy in democratic planning - then a problem for regional level intervention may arise unless the legitimacy of London-wide planning is bolstered. It is suggested this has ramifications for the central research question in terms of robust planning as well as equity, particularly if supposed strategic advantages of metropolitan decision making fail to materialise in retail planning.

CONCLUSION

“There should be some degree of what I wouldn’t call coordination, but strategic regional planning. But that shouldn’t prevent some of the smaller centres... being able to improve their shopping offer.”

Assistant Director responsible for planning at an inner London council:
Interview March 2006.

12. Conclusions and Recommendations

12.1 Current Difficulties in Increasing Metropolitan Retail Planning

12.2 Coordination and Professional Change

12. Conclusions and Recommendations

12.1 Current Difficulties in Increasing Metropolitan Retail Planning

Expectations of Regional Strategy

This study has discussed the potential contribution of planning institutions in major town centre redevelopment, and considered how professional expertise, specific organisational experience, specialist knowledge and theoretical insight vary in how they materialise.

Given the retail planning capabilities of developers, the close alignment between them and the Mayor of London may be expected to confer advantage on planning town centres at the metropolitan level. However the deployment of traditional spatial concepts of commercial location through a vertical hierarchy, hinting at, but not taking forward a polycentric London (Figure 2) suggests otherwise. It is major private interests that have been incorporated, more than the retail understanding that shapes their agenda.

The regional scale should be an attractive forum for identifying, and discussing how to move towards, a more optimal metropolitan town centre network. Yet it seems the 'strategic advantage' of the GLA may currently lie more in practical merits (possibly how well it is placed to negotiate with developers, and also perhaps in terms of in-house resources). This would answer the practical issue of how regional planning could benefit town centres. Yet LPAs are beginning to work sub-regionally to this end (Bianconi *et al*, 2006). Moreover, this is not coordination. If coordination is the potential comparative advantage that lies inherent in organising planning from this scale, then this study has found the Mayor of London is failing. The London Plan does not offer retail planning policy leadership in managing the challenge of growth set out in the Plan.

This study concludes the extent of local leadership in town centres planning should not be diminished in practice, given current understanding levels. It is found the GLA seems engaged in orchestrated reactive town centre planning, an indirect constituent of London Plan motivated interventions in other sectors. Furthermore, the London Plan review affords no prospects of significant change with respect to town centre potential.

There is justification for concerns about whether local planners have the necessary ambition in accordance with the growth strategy. Whilst a subject ripe for further

investigation, the evidence here suggests this may arise from a combination of political imperatives, and the capacity of professionals intervening in retailing. It has to be stressed these are not inherently local factors, whereas the greater sensitivity of LPAs to non-commercial interests (as well as closely tailored retail-led development proposals) is viewed by this study to be crucial.

Purposeful Town Centre Planning

The research ultimately supports local leadership in town centre redevelopment, and this can be attributed to the normative purpose of town centres taken in the study. Town centres can be focal points helping to internally define cities, an essentially collective view that can enrich a functional approach centred on retail. Retail planning has to move from planning for retail to planning for town centres, without alienating shop developers and retailers. Their expertise has to be utilised and applied for ultimately non-commercial ends.

Central government's new, active, planning aims have been associated with town centres policy changes (for example, such as positive planning to accommodate development as needed). These further complicated the dynamic issues of retail in planning - as seen in proposals such as White City - but have not reconsidered the spatial terms of reference for retail planning decisions. New national policy has not engaged with retail change to identify effective means to judge where a contemporary town centre should be heading. There needs to be external input to bring resources, data and ideas about what purpose modern central shopping locations should serve. However there are internal contradictions loaded into the system, such as increased public engagement parallel to a commitment to a pro-growth agenda. Plan-led policy has not yet adapted to these issues, and this needs to be addressed before specific technical retail concerns can be debated.

12.2 Coordination and Professional Change

Coordination is one method of organising planning for change, but need not be the only strategic focus. Coordination may be a less responsive approach than is demanded by retail markets. For current planning pressures to be absorbed more explicit recognition may be necessary of policy *integration* (see Meijers, 2004). Political pressures will produce some incoherence against desired outcomes in London, but the discretionary nature of British planning is potentially flexible to policy integration maximising the effectiveness of directing the change in town centres as a whole. On this basis there could be more metropolitan input to the strategy deciding the future for London's town centres. It

may be decided that the current subordinate place of the retail sector in the spatial strategy for London is acceptable as a political choice. This research has not considered such a judgement, and further public debate is necessary.

Many of the ideas about the availability, and disposition to seek out, relevant models of commercial location across metropolitan space presented in this study apply to planning as a whole, and therefore not any particular level. Options for organisational reform have been explored. Therefore the recommendations reported here are professional, not specific to tiers of government.

It is recommended that to overcome conservatism in the scope of retail planning policy, all strategic spatial decisions should moot alternative options. This would foster best practice by helping to generate new ideas appropriate to varied retailing circumstances. 'Town centres first' may indeed be the most sustainable general retail location principle, but is it all too convenient not to consider the environment in question, if seen as axiomatic. As well as forming a vision of endpoints for local town centres, this flexibility should include factor in allowance for retail variables. This is additionally important given the positive planning stance of the government, and the major uncertainty of future changes such as the impact of electronic communications on shopping.

Similarly, it is also recommended active policy reconsideration extends to a very clear and explicit analysis of the actual current distribution of retailing versus the most sustainable distribution the market can deliver. The vertical retail hierarchy is too often observed, then applied, without recognition of this distinction. In order to be clear about existing circumstances before targets are discussed, this will require a better integration of private sector knowledge with mainstream planning understanding. Decision-makers have to relate better to the research community to help foster applicable notions of different paths. Other outcomes must be examined before decisions taken on their desirability. Then the issue will become whether strong political support remains.

SPECIAL NOTE

**ITEM SCANNED AS SUPPLIED
PAGINATION IS AS SEEN**

RESEARCH APPENDIX A: LIMITING PERSPECTIVES OF ECONOMICS

If retailing forms an interface between individuals, demographic groups and organisational agendas, then there will be spatial implications in how this is played out. However understanding this has been hindered by the limitations of a few dominant concepts. This appendix details some of arguments in this respect summarised in the main study.

Contemporary Consumers and Retailers

Modern shops were originally formed to bring industrial products to new urban populations, thus retailing can be seen as “a delivery agent to society of the economic changes associated with... post-industrial transition.” (Dawson, 1999: 405). This can be insightful, but studies of shopping development are impoverished if seen solely as the materialisation of a one-way process. Traditional approaches to economic change will fail to capture implications of the transformation if predicated on the sovereign consumer. This difficulty may arise as the perfect models of classical economics may be too deeply entrenched; but it is not just economists whose understanding is thus hindered.

- JK Galbraith identified the defining influence of active corporate strategy in capital reproduction. Demand is managed through means such as advertising to realise profit from anticipated technological or geographic opportunities. Growth is derived from new markets, seen in terms of products (or places) to be exploited, rather than the classical view of directly in response to consumer identification of unmet wants.
- Galbraith's key argument remains intact, despite shifts in the productive base of economies like Britain. The cohesive organisation of society associated with the mass production of Galbraith's era (the 'Fordist regime of accumulation'), fragmented following international trade competition (see Amin, 1994). Yet technological innovation for new products is still very important, as it was in the immediate postwar era, but expectations of global business have further increased place-based commercial opportunities.

Many contemporary economists now claim renewed understanding of geographic differentiation in how markets operate. This is when set against traditional static approaches (see Evans, 1985). However Martin (1999) asserts this spatial appreciation is superficial, and dismisses the grasp over space claimed by the likes of Porter (1990) and Krugman (1991). Yet economic attention given to clustering and the nature of agglomeration economies can be insightful if appropriately applied (see Bird, 1977). As Jackson *et al* (2006) found with research on shopper impacts of contemporary restructuring, currently this could be particularly productive if local retail competition were addressed.

- After recognising these concerns, it can be concluded businesses - and especially retailers that have typically grown into large organisations from shops based in specific areas - will implement their expansion/restructuring policies with reference to an explicitly geographic context. OIRM (2006: 11) reporting for the London Mayor, gave credence to retailers in London as “active agents in their own right”, rather than intermediaries.
- Thus the manipulation (or shaping, at minimum) of consumption patterns by producer interests remains relevant to retail spatial decisions. Unfortunately a tendency remains assume this away, adopting an explicitly linear approach for methodological simplicity, especially for modelling and commercial purposes (for example Wilson, 1988). Henceforth it is unsurprising prevalent notions of commercial space tend to exclude **corporate policy**, especially underplaying public intervention.

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Identifying Central Place Theory Issues

Carter's (1995) volume provides a comprehensive outline of concepts arising from Central Place Theory, highlighting alternative forms of concentration to the various forms of (town) centre, such as linear and non-spatial, functionally specialised, arrangements. Some of these perspectives could be relevant to town centres, but their lack of consideration by planners leaves few options to escape limitations in CPT's contemporary application.

Part of the appeal of CPT is its geographic neatness, and in turn this can be attributed to the simplicity of the underlying economic assumptions in how it is interpreted. These are the same classic roots derived from a self-contained basic economy (see Evans, 1985) that leads to a free-market 'fetish' that favours retail as a pure example of absolute consumer sovereignty. As seen, the most problematic outcome of this inherent shortfall in CPT, is that without explicit discussion of public and private sector interaction and decisions, the influence of strategies can be denied.

Guy (1980) identified that the economically deterministic rationale of CPT could become self-fulfilling (despite the being founded on a fatal misconception) if the real reason for maintenance of concentrated retailing in Britain was the outcome of political decisions, rather than rational economic optimisation. This may occur given the focus of national retail planning policy.

In turn, there is a need to distinguish, for the applicability of theory, present reality from **model situations**. This requires an appreciation of the role of political choices, and how theory should inform but not determine the direction of change. This can be a major practical dilemma, for example Lovering's (1999) *Policy Led By Theory* on regional economic development.

RESEARCH APPENDIX B: PROCESSES OF POLICY CHANGE

This section is focused on analysis of policy, as the defining context for the sub-national agendas investigated in the Findings and Discussion. Tewdwr Jones (2002) established that although a plan-led system bestows much decision taking weight on sub-national statutory plans, central government carefully limits this autonomy in the name of consistency.

Thus the national lead forms a critical context, and this is detailed in second section, after the overall context of change is detailed. The themes drawn out are highly pertinent to the new planning regime, especially since 2004, under which town centres policy will have to be refined.

The final section contains detailed analysis that underpins the findings of the White City Centre case. It tracks changes in local policy, and explores in particular the council's response to scrutiny from the central government agency, the Planning Inspectorate.

Planning Principles and New Priorities

This sets the current context of change for planning relevant to the subsequent section on government town centres policy.

Planning Objectives

The government has sought to change planning and sharpen its focus. The ambition behind this can be recognised in appreciating the cumulative outcome of the procedural changes and structural revisions of the 2004 Planning and Compulsory Purchase Act, overlain with a redirection the principles underlying planning decisions. This research explores the growth in regional level responsibilities and policy, with specific reference to the planning for town centres agenda.

However the shift toward an explicit broad aims for planning as a whole has arguably been even more fundamental, particularly the installation of an over-riding vision, namely, sustainability. "Sustainable development is the core principle underpinning planning." (ODPM, 2005a:2). This is enshrined in *Planning Policy Statement 1: Delivering Sustainable Development* (PPS1), which - whilst a clear advance from its predecessor PPG1 "General Policy and Principles" (DoE, 1997) – requires some vision in terms of the direction for the nation's urban spaces (see ODPM, 2005a). Metropolitan town centres can help illustrate the dilemmas and opportunities arising.

Structures and Change

The theme of sustainability is used by PPS1 to promote integrative planning. Its concerns are well articulated by the balance of interests the 'town centre first' policy aspires to. However there are some other common principles that exemplify these more holistic aspirations. These are more implicit, but refer to the attitudinal strides seen as required: "mak[ing] a positive difference to people's lives and help[ing] to deliver homes, jobs, and better opportunities for all" (ODPM, 2005a: 2). This normative mandate demands a qualitative change, but for governments the main tools necessitated are seen to be structural. It is emphasized:

"Th[e] **plan-led system**, and the certainty and predictability it aims to provide, is central to planning and plays the key role in integrating sustainable development objectives." (ODPM, 2005a:3).

Development plans are integral, and therefore the capacity for them to enforce and informed strategy in response to local circumstances is critical to planning's ability to deliver sustainable development.

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This structural preoccupation, and the pressure for reform, can be seen as a search for an institutional setting to facilitate growth in a context of greater global competition. This has been associated with interest in the organisation of sub-national territory and development policy. Recent political interest in regions, specifically in overcoming metropolitan fragmentation and city-wide governance (see Marshall *et al*, 2004) is essentially focused on economic development.

Regional administration has been revived with a triad of institutions in England covering central government co-ordination, representation of local interests, and economic development, but it is the latter arena with influence and resources (Musson *et al*, 2005). The GLA family structure in London is unique in this country, but the influence of the economic development limb (the LDA) and GLA Economics is apparent. (This does not necessarily relate to the organisation's practices in planning, other than the position in relation to overall policies/attitudes to development.)

In terms of changes to the planning system, the statutory regional plans in PPS11 (ODPM, 2005c) are a 'solution', possibly judged proven from London. This replaces the guidance in force since RPG was introduced in the landmark policy U-turn of PPG12 *Development Plans and Regional Planning Guidance* (DoE, 1992). This is a substantial change away from the flexibility first approach to regional plans, but is actually part of a longer history. Past major regional planning¹ initiatives barely covered retailing (Kivell and Shaw, 1980), and Dawson (1980b) highlighted shopping was not used to help to deliver growth priorities despite its increasing economic significance. However it is not the growth potential of retail per se that led its unexpected inclusion within the new regional planning via national town centres policy (Guy, 2004), but a reconsideration of how the impacts of growth on town centre vitality and viability can best be managed (the issue of scale, see below).

The Paths to Present Policy

This deals with evolution of retail and town centres policy; some of the detailed assessment here is significant in setting out the demanding requirement of contemporary retail planning policy, above and beyond 'town centres first'. Some prominent aspects in relation to White City are brought out at the end.

History of current policy

- 1988- Town centres policy is a good example of incremental public decision making in evolution (see Quinn, 1996). This can be seen both in a simple comparison of original policy with the present position, and also from examination of steps undertaken. For instance, *Planning Policy Guidance 6: Major Retail Development* (DoE, 1988) is of notable brevity at three and half pages of description and procedural outline, whereas the current equivalent is almost tenfold in size and confidently broad in scope. Whether this latest version represents any substantial change in itself is in question. However it does demonstrate how the policy of 1988 reflects the laissez faire approach of the day, with the only actual policy element limited to a reiteration of a three-year old ministerial statement, opening with "it is not the function of the planning system to inhibit competition..." (DoE, 1988: 2). This was issued as part of the first suite of national topic policy, but whilst it replaced Development Control Policy Notes, failed to advance strategic aspirations either.

¹ Yet greater sub-national retail planning was predicted by some not on this trend, but arising from volatility in academic interest (see Brown, 1992).

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- 1993- A major update was issued in *PPG6: Town Centres and Retail Developments* (DoE, 1993). This made explicit the difficulties of retail decentralisation that may be taken into account, but did not put this in a relative sense in relation to the urban features served, and continued to prove ineffectual in refocusing the distribution of commercial investment. The most significant leap in the evolution of policy came with the acceptance of greater dirigisme after the mid 1990s recession, when many of the concepts now familiar were introduced, notably **the sequential approach to site location to put town centres literally first on the list of where retail should be located**. This broader, more substantial *Revised PPG6* (DoE, 1996) document actively sought out strategies for town centres.
- 1996- The bolstering of PPG6 was a seminal decision in moving towards a more levelling retail investment playing field, providing a loading in support of more central and established locations. However the increased coverage in the policy raised the stakes at play in the property industry, effectively inviting developers² to seek out and exploit – or even create - inconsistencies and uncertainty. Refinements were forced, delivered through a series of ministerial statements in 1997, 1999 and 2003. This expedited the production of a brand new policy document on the topic as part of the rolling switch to *Planning Policy Statements* (rather than 'Guidance')³.

2005- Current National Town Centres Policy

Planning Policy Statement 6: Planning for Town Centres (PPS6) sets a clear rank of priorities, foremost of which states: "vitality and viability" is the primary concern (2005b: 5). This policy is defined to cover uses including offices (where there is great scope for further research on the application of this by LPAs), and extends as wide as arts and tourism. Therefore the transition from 1988's "Major Retail Development" to today's "Planning for Town Centres" reflects more than an alternative phraseology.

After outlining objectives, PPS6 then goes on to set out how these should be secured, and as implied above, this appeals for a comprehensive planning approach. The government requires LPAs to use all the tools placed at their disposal over recent years to these ends. Yet the noteworthy aspects here are the new emphasis on an equal role for regional action, and the pivotal place afforded to notions of an organised spatial form of centres, given the possibility that LPAs often are unable to form any effective town centres strategy at all.

The elevated place given by PPS6 to the hierarchy of town centres can be regarded as significant in a plan-led process, when set against the extent and unpredictability of retail change. This raises the issue of how the statutory plans process, in particular can not just respond to, but prompt, moves to alternative town centre networks. As highlighted in Chapter 8, the scrutiny over the London Plan tested the unqualified application and teased out this distinction. There is a nod in PPS6 to this temporal dimension, but not to the difficulties it raises. The main focus in change management is on ensuring – unlike the origins of White City – development is plan, and not, planning application, led.

The hierarchy has typically been used as a static tool, although its main attraction has been the hold through its *descriptive* purchase. As part of this description, hierarchy

² These tend to be large in the retail redevelopment sector, and major organisations also tend to exert substantial and possibly disproportionate influence at the stage of formation of policy as Chapter 8 illustrates for the London Plan.

³ Semantics aside, the government have publicly but discretely confirmed that this form of policy is meant to be applied less loosely than guidance.

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seems to be used to define planning roles as much retail functions. A rationale for regional retail planning in itself is not advanced in PPS6⁴, but regional plans are introduced as: “set[ting] out a vision and strategy for the region’s growth” (ODPM, 2005b: 9). The extent to which regional involvement is effective is thus perhaps dependent on the ability to look forward and be open and adept at picking up pathway options, and its capacity to instil a framework identifying the planning route towards a more optimal network.

One aspect picked up on anew by PPS6 is an emergent challenge on the traditional vertical hierarchy, is retail polarisation. In a geographic sense this involves a dominance of investment by a couple of very major developments, squeezing out the traditional mid-size functions and leaving a large rump of widely scattered small retail locations. Hence PPS6 raises the question of the:

“need to rebalance the network of centres to ensure it is not overly dominated by the largest centres, that there is a more even distribution of town centre uses, and that people’s everyday needs are met at the local level.” (ODPM, 2005b: 8).

This is in recognition of polarisation, which is driven by retail formats as well as the fortunes of town centres versus city centres. The test featured in PPS6 to serve this objective is a criterion of scale for assessing developments such as White City, in potential addition to the established sequential approach, issues of need and acceptability of impact. Scale is very significant as it applies to developments within town centres and entails that unless a formal plan-led approach to the contrary has been successfully pursued, no centre should grow disproportionate to its existing size and function. Thus this gives development control teeth to the static tendency of a hierarchical approach to retail location.

The government emphasised PPS6 would bring about a shift demanding LPAs actively made provision for central retail sites in statutory plans. This is a clear example of the shift required to deliver PPS1 and positive planning if LPAs remain in a reactive mindset. The interviewee from the GLA alleged this was the case and formed a major problem in growth accommodation, but this moreover is highly symbolic in the extent to which LPAs are expected to effectively partner retailers and facilitate their requirements in order to ensure a sustainable location ensues.

Yet there is another feature hidden in PPS6, which is a significant in its demands of how planners have to inform their statutory plan making in pursuit of active planning. This can have ‘positivist tones’. One of the major moves after PPG6 was revised was an attention to the form of demand for development. A ‘need’ for development in any out of town centre location has to be demonstrated⁵ (as well as demonstrating no sequentially preferable sites are available). This is significant because this calculation then sets the demands on LPAs, as councils are supposed to meet this need by identifying specific sites where development could take place. It is this active accommodation of growth in retail requirements that most substantially reflects the demand for active policy consideration of private sector interest -an approach of **positive planning**.

⁴ Ayres and Pearce’s (2005: 545) investigation of policy formation is noteworthy. Their “overall impression is that government departments are pumping up regional institutions to their own policy and delivery agendas”. They found this occurred in flagship planning policy pushed through, without any internal coordination with other relevant departments.

⁵ However this is not an innovation as this market assessment by planners was a notion featured in central government policy in the 1970s.

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The property industry pragmatically developed a range of justifications under this umbrella to suit circumstance, in response to this further move away from the old dictum of 'not the purpose of planning to become involved in factors of competition...'. Reliance was often placed on retailer arguments of consumer 'choice' or 'comfort'. However the Ministers preferred approaches that had been advanced in appeals with more of a 'predict and provide' mentality. Therefore, LPAs "should place greater weight on quantitative need for additional floorspace for specific types of retail and leisure developments." (ODPM, 2005b: 14). Estimating future space necessitates calculation of:

"existing and forecast population levels; forecast expenditure for specific classes of goods to be sold...; and forecast improvements in productivity in the use of floorspace. Such an assessment should provide sufficient information on which to base strategic choices about where growth should be accommodated..." (OPDM, 2005b: 14).

Apart from the resource pressures of such specific work, the last forecasting requirement is particularly onerous and, as dependent on many variables and no published data has proved demanding even within the private sector. As the GLA found out (Experian, 2004)) this is a very contentious issue, with a great sensitivity of space expectations to this retail efficiency calculation. This is a prime example of the serious technical and professional changes laid down by the ambitious requirements of PPS6.

Summary and Specific Examples

Town centres policy has become increasingly ambitious as it tries to reconcile national sustainability and competitiveness objectives. There is now a great reliance technical retail tests, including in preparation of policy as well as development control decisions. Therefore the local strategy should be informed by this basis, but this is dependent on the planning capacity of sub-national institutions. The table below considers some of the issues arising in relation to the example case.

White City and National Policy Change

The White City Case depicts why, due to the impact of major town centre schemes on other town centres, gross size in relation to the whole catchment area is becoming more important consideration wherever the location. This is one example where a wider perspective than LPAs can commonly offer may be necessitated.

Thorough assessment of national policy reveals why, in terms of town centre inter-dependencies, decisions on developments like White City may have not been any better conceptually informed given the profession's orthodox use of the vertical retail hierarchy when considering commercial locations. This is because national policy's emphasis on measuring against the existing size of the town centre, which is inevitably conceived in relation to the perceived, rather than actively desirable, distribution.

Moves to 'promote' centres to a higher place in this structure – a conscious and negotiated choice - are now entirely dependent on the development plan process. This, as shown through the detailed research on the local UDP in this case, did not prove a popular or proper mechanism in the case of the White City Centre.

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White City Formation of Positions

This part of the appendix sets the context for the case in Chapter 9, and then analyses how the council's approach has changed over time in response to pressures through public documents on the UDP review process, but also applying interview findings. The major element of this background is how changes to local planning policy applicable to White City were put forward by developers and accepted Hammersmith & Fulham council, who went on to pursue this position of general support for White City, despite demands to qualify the approach after scrutiny from the Planning Inspectorate. The detailed analysis of the Unitary Development Plan (UDP) supports the overview in the study examining the implications of the council and developer's approach.

Submission of Planning Applications

The site consists of former industrial land and a depot for London Underground to the north of Shepherd's Bush Green. Construction has started on site (and a new access off the A3220 West Cross Route former Motorway has been completed), although the scheme is still evolving.⁶ It will sit above 4,500 car parking spaces.

Due to the scale of the under-used site, in the 1980s the council began to entertain a less strict approach than the well-established policy of retaining industrial activity. On this basis, an outline application by Chelsfield PLC in 1996 for a shopping centre (but without the business element) was approved, conditional to a limit of 57,968sqm on shop floorspace. Further extensions have been approved, primarily justified on the basis of design reasons or stated benefits in terms of improved functional integration with Shepherd's Bush.

The other significant approval follows an 2002 outline application by Chelsfield for a south-west corner extension to link towards Uxbridge Road/Shepherd's Bush Green. This limited the extra element of retail to an additional 29,100sqm of A1 floorspace. Smaller increases in floorspace have also been permitted in relation to submission of details and format amendments. For example, a variation of condition in 2000 increased the food/drink hospitality limit from 3,558sqm to 20,468sqm. It is not possible to fully explore the changes in detail but the overall move has been towards securing greater floorspace without losing the flexibility gained by the developer in the original outline application.

Local Policy Formation

The handling of the site in the adopted UDP review process has been analysed. The procedure will change with a greater emphasis on community consultation and plan flexibility as a result of the 2004 Act. Yet this evidence shows the influence wielded by the developer, as changes were introduced that provided, cumulatively, much greater flexibility. Overall in terms of the tests for retail proposals, the biggest change was the extension of Shepherd's Bush town centre's boundary as shown on the UDP Map (rather than the Employment Zone designation). Inclusion of the site in the town centre means subsequent proposals were not required to fulfil major checks relating to factors such as need for the facility and the well known sequential approach to site location. This process leading up to this is presented as a timeline.

⁶ Further applications have been submitted this summer to increase the permitted shop floorspace by a further 18,500sqm. The current stated opening date is 2008. It is the only one of 10 centres of this scale considered by Lowe (2000) to remain incomplete.

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Timeline: UDP Formative Stages

Year	Stage	Action
1994	Borough's first UDP adopted.	The interest of an entrepreneur in the potential of the site led to emerging ideas of a speculative shopping centre development. This held the prospect of increased employment and resulted in a site policy for shops, offices, workshops and supporting facilities in the borough's Plan (LBHF, 1994). It retained its 'Employment Zone' (EZ) designation, along with land around the BBC to the north, specifying the allowable forms of commercial development.
1999	First public 'deposit': of initial UDP revision proposals	New White City developer Chelsfield objected to details of the council's first version UDP changes (LBHF, 1999) despite having ensured they contained, critically, the inclusion of the site as an extension to the town centre. This jeopardised the traditional EZ policy.
2000	Second public 'deposit': version of UDP proposals following 1999 consultation	This resulted in a proposed Plan with extensive coverage catering for the White City Centre in a number of policies and respects, in the Revised Proposed Alterations version (LBHF, 2000), after which the Public Inquiry followed.
20001	Public Inquiry: scrutiny by independent central government agency of the Planning Inspectorate	Other interested parties engaged in the process, such as statutory undertakers and the borough of Ealing (which would bear a major impact) but no members of the public or community representatives (LBHF, 2001) on White City.
2002	Proposed Modifications consultation: council's response to Planning Inspectorate's report	Council's reply to reasoned analysis arising from the Public Inquiry is revealed: the policy still focuses on promoting the principle of the site. See below.
2003	UDP revision adopted	Currently applicable local statutory policy 'Site 36' comes in to force.

The most interesting document is the Proposed Modifications summarising and advancing changes to the Inspector's recommendations arising from the Public Inquiry. Examination of this (LBHF, 2002a) reveals the Inspector reduced the policy coverage in support of White City, but did accept some of the amendments suggested by Chelsfield. The council followed his recommendations in these respects. However in terms of a key consideration now included in PPS6, and current major issues in retail planning thinking, the council ignored the Inspectors considered judgement. This was a request to:

"state the amount and type of retail, town centre and housing development for which quantitative and qualitative needs have been identified, distinguishing between development necessary to meet the strategic objectives of the UDP, and supplementary development that may be acceptable in order to bring suitable proposals forward." (LBHF, 2002a: 172-3).

This is an attempt to introduce balance to the policy and definable limits to the council's seemingly unqualified support for the proposals. The identification of need shows the significance of national policy -the basis from which the Inspector can call for a stronger evidence base for the council's position. Of particular note is the desire for policy to play

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its proper role in governing relationships between stakeholders, unbundling strategy against practical necessity, and aims against priorities.

In response LBHF (2002: 172) exercised its - rarely invoked - prerogative (now removed by government) of ignoring the Inspector, dismissing the extra teeth to the policy as "unnecessary detail". The role of the developer in shaping the council's view on this could be investigated further if private communications can be made public. However the AD was questioned in the interview research about this decision, and responded on plan-making in general, but did admit "*it is very difficult to say it goes and takes it [the development scale] too far*". This reflects **conceptual and technical problems in finding a means to judge the appropriateness** of a rapidly expanding development scheme.

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RESEARCH APPENDIX C: IN-DEPTH INTERVIEWS –PROCEDCURES AND CONTENT

This firstly sets out handling of the interviews and their findings and then includes the tables detailing the views of the interviewees. Transcripts are attached.

Interviews

The interviews were conducted in March 2006, with contacts having been established from investigation commencing early in the year. The interview, on accepting the request, was supplied with an overview of the structure of the session a week in advance. However the specific points for discussion were not revealed in advance. The conversations were recorded, and soon transcribed by a third party under the author's guidance; although notes were taken on thematic and stylistic matters and have been utilised here. Anonymity was offered to all participants.

In discussing technical issues with professionals there can arise what Fine (1993:288) identified as potential ethical and practical difficulties of a "different universe of discourse" between researcher and interviewee. This requires self-awareness of the researcher about the perceptions of the interviewee, although these may be positive in the setting of a semi-structured interview (see Valentine, 1997). All interviews proceeded positively, with one interviewee keen to extend (by 50%) the discussion beyond the allotted period of an hour.⁷

Overall the intention was to develop a conversation which led to reassessment or realisation of effectiveness of current planning for town centres, both in procedural impact of stakeholders and in how the profession thinks changes through. This was tailored to the organisation, position and experience of the interviewee. A constant approach was adopted of simple questions enquiring after general views on the effectiveness of retail planning in London to introduce the discussion, then moving on to a core discussion on the input of different tiers of government and local residents/consumers in town centre developments.

The literature and policy review informed the choice of specific topics. All three were asked individual points, specific to their role in policy making arising from documentary evidence uncovered on the public policy process of their institution or recorded comments. The discussion culminated on issues arising for London from recent national policy refinements and – drawing from the outcome of previous comments – how these build on established and emerging theories in planning and retail. Potential questions had been given prior consideration, but the exact structure varied with the inclusion of supplementary questions and sometimes further probing of specific points.⁸

For an informed private sector perspective, a Planning Partner of a major West End surveyor, spared time for a discussion. He is the Partner responsible for all retail and town planning work at the property consultancy, and since qualifying as a planner and then a chartered surveyor has acquired significant status despite only 18years experience. The West End Partner (WEP) as he preferred to be known, has been contracted by the government in relation to the current town centres policy, and has also given expert evidence at public inquiries into some of the largest contemporary retail redevelopments, including the Bent Cross extension. As the interviewee with specialist retail knowledge applied across the country, he had an excellent understanding of current retail, development, and planning policy issues. The WEP held clear and distinct thoughts and

⁷ The findings of the interviews are summarised, and discussed in chapter10.

⁸ Reserve questions had been prepared but in no instances were these required as discussions required the full time allocation of one hour.

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rationale, which proved useful on the direction of national policy and informed by his involvement on in instrumental regional size retail proposals.

Input from the GLA was necessary, and a session with a Senior Strategic Planner (SSP) was secured. He worked in the SDS (London Plan) Team and specialised in commercial and town centre topics. The interviewee addressed the points carefully, with an element of diplomacy required when governing over the range of interests found in the metropolis. Interests were strongly defined round the Mayor's stated priority social groups. However close familiarity with the background behind the contemporary concepts deployed in commercial activity over space, ensuring a rewarding insight.

In terms of a Local Planning Authority, Hammersmith & Fulham was selected due to its role in the White City Centre. Plus it formed, at that date, a New Labour style council (sharing many objectives with the Mayor) with a strong executive. It is also located, at the western fringe of inner London, a densely developed borough that is subject to further growth pressure. The officer interviewed held the rank of Assistant Director, and had long experience in the borough and was now with overall responsibility for planning and holds direct control over policy formation. He is referred to as AD, and provided much practical insight and was keen to discuss retail provision further. The account seemed to depict a managerialist pragmatism, with a clear understanding of priority relationships, but a relatively narrow view of the functions and capacity of town centres and intervention required.

Content Analysis

The transcripts were annotated (sample attached) after a period of familiarisation involving revisiting the notes made at, and immediately after, interview. Tabulation then took place on the basis of coding of response points on the basis of policy, planning operations, people, and finally with reference to how notions of retail space can be deployed and specific developments; all as identified from preceding research stages. Specifically:

1. PPS6
2. London Plan
3. Council policy
4. GOL involvement and call-ins
5. Regional interventions in LPA jurisdiction
6. Local development control
7. Politicians
8. Communities/ consumers
9. 'Concepts'
10. White City Centre

The latter points have been drawn together in discussing the case. In terms of evaluation, these recorded points were written out on tables for each issue bringing together the views of the participants. A broadly standard approach, this accords closely with that advocated by Kitchin and Tate (2000). This has been organised through iteration in the following tables, which draws together the points of tabulation on the basis of intervening institutions (or people). Therefore this outlines, for the applicable level of organisation, the purpose that the informed professionals view should be played in town centre redevelopment -both for more strategic or generic positioning, and as tends to work out in practice (the lower end of the chart).

The results of this are discussed in Chapter 10. Also included is a table on the responses and what they mean on the part of the interview seeking to explore how appropriate the ideas are that are commonly utilised. These are presented on the basis of identifying now familiar concepts. Depending on the notion in question, the comments are classified as either in relation to the orthodox retail planning identified in the literature (and still exerting

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influence and included in policy), or the range of ideas that are becoming more prevalent (but not necessarily better defined) –often from the new emphasis in PPS6 as compared to PPG6, or following the Act 2004. This latter loose collection is entitled 'new planning thinking'.

Summary Points

Used as an assessment to aid interpretation of interviews.

What purpose should *PPS6/national government involvement* serve in major town centre redevelopment in London, according to....

	WEP	AD	SSP
PPS6	<ul style="list-style-type: none"> Should be more idealistic, recognising the role of political judgements, but encouraging culture change in planning. Relationship with the operation of the London Plan could be less dependent. Can facilitate innovations in retail, which could be explored further. 	<ul style="list-style-type: none"> Although works towards sustainable development and is largely locally unproblematic in implementation, could be more realistic in its expectations of intervention. May need to have more direct influence over retail formats. 	<ul style="list-style-type: none"> Should continue to reign in decentralisation. Would be better if sub-national identity could be expressed.
National government involvement	<ul style="list-style-type: none"> Could fill-in for ineffectual regional planning. Can, with regions, evaluation the performance of LPAs. Moderate over political conflict. 	<ul style="list-style-type: none"> Continue to assist in the interpretation of policy and offer advice on large proposals. 	<ul style="list-style-type: none"> Could play a less strict role in enforcing a nationally-specified retail distribution.

What purpose should the *London Plan/Regional Strategy/regional interventions in planning decisions* serve in major town centre redevelopment in London, according to....

	WEP	AD	SSP
The London Plan [Spatial Development Strategy]	<ul style="list-style-type: none"> • Develop a more creative and less reactive position. • Remain the forum for common understanding and collective decision-making but needs to further build strategic retail insight in London. • Have a better quality evidence base for an avowedly rational approach, and be used to inform local determination. • Break ground, playing a role in addition to national policy, and enable improved change management. • Consider more explicitly the way it is engaging in accommodating major city regeneration. 	<ul style="list-style-type: none"> • Provide an overall strategy that is not so broad, but without the areas of prescription on local retailing. 	<ul style="list-style-type: none"> • Lead strategy by direction setting for upper levels of hierarchy with a holistic balance. • Be a prime empirical base providing a means of town centre evaluation, a snapshot against which change be measured. • Regenerate selected town centres, fulfilling the potential of areas within an optimal network. • Enable delivery of other primary drivers of growth eg housing, global offices.
Regional Strategy generally	<ul style="list-style-type: none"> • At least identify potential and set basic criteria for consideration of regional scale proposals. • Provide a framework on which major private investment decisions can be formed. 	<ul style="list-style-type: none"> • Ensure integration with the transport infrastructure. 	<ul style="list-style-type: none"> •

Regional interventions	<ul style="list-style-type: none"> • Look at scenarios. • Should have the potential to take “hard decisions” on an objective basis, rather than protecting existing/vested interests and settlements and precluding options. • Continue to cross-check and verify decisions for consistency, impact on locations outside the LPA’s area, and inappropriately large developments. • Enforce regional priorities. • Consider the big picture such as overall national interests. • Provide a means of practical back up for LPAs. 	<ul style="list-style-type: none"> • Could be redefined in so that although a clear role remains, LPAs can be confident to handle local schemes. 	<ul style="list-style-type: none"> • Deliver the overall regional spatial planning agenda, with regard to impetus for change and the role of retail in urban development. • Act as a check on inconsistent LPAs, and to be used internally for regional self-scrutiny.
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What purpose should *council policy*/ *LPA development control decisions* serve in major town centre redevelopment in London, according to...

	WEP	AD	SSP
<i>Council policy</i>	<ul style="list-style-type: none"> Act as a catalyst of actual development, a nexus through which change can be driven – possibly by forming a channel for developers to engage with stakeholders and construct consensus locally. Despite councils holding a valid locally-focused agenda in aspects of development, such as in convenience retail led schemes, they need to consider options for change other than those that arise from balancing immediate pressures. 	<ul style="list-style-type: none"> There is no clear set role, but a requirement for councils to attempt some form of ‘testing the water’. Can be an enabler of appropriate development, with an active role particularly in bringing other key public sector partners on board. Council policy tends to set out the terms of relationships eg with partners, or express limits to intervention to developers. This should balance up the need for commercial competition with local aspirations. Consistency is important, and strategies should therefore be responsive over time to practical demands. 	<ul style="list-style-type: none"> Councils should complete the picture of strategic decision making with local sensitivity bringing a dimension of richness to retail planning and town centre redevelopment decisions. Councils must begin to be more positive in implementing change, bringing forward sites to fulfil the set hierarchy.
<i>LPA DC decisions</i>	<ul style="list-style-type: none"> Currently forms the spearhead of change procedurally, and could be more uniformly active in pursuit of this. Serves as a bottom-up means 	<ul style="list-style-type: none"> Form the grounded base of LPA influence, especially when market conditions dictate an management rather than redevelopment approach. 	<ul style="list-style-type: none"> Should continue to represent the face of town centre change. Be balanced, so more in favour of enabling as a

	<p>by which gaps in strategy or information are filled in externally, although some form of co-ordination should be overlain.</p> <ul style="list-style-type: none">• Acts as a default option i.e. when retail expertise fragments.	<ul style="list-style-type: none">• Be intertwined with strategy in planning as well established as an iterative 'negotiative' process -refining planning (as well as social and economic) priorities in complex urban interests.• Be seen, through the appeals process, as a source of clear scrutiny and therefore democratic legitimisation.• Play an influential part in partnership formation and maintenance.	<p>powerful. mechanism to overcome local blocks that are only partial.</p>
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What purpose should *politicians/communities* serve in major town centre redevelopment in London, according to....

	WEP	AD	SSP
Politicians	<ul style="list-style-type: none"> • Seek a way through change, possibly by the approach of the Mayor in interventions symbolising a re-ordering city development along chosen principles. • Hold less sway over local destiny, or be forced to become less pusillanimous. 	<ul style="list-style-type: none"> • It should be highlighted how the Mayor personally imprints across all major development in London. • There is clear evidence that local politicians can be the decisive players in beneficial major projects materialising. • Politicians tend to provide a useful focus around which planners can coalesce. 	<ul style="list-style-type: none"> • Define interests against which the effectiveness of retail planning and town centre regeneration are defined.
Communities	<ul style="list-style-type: none"> • Should become engaged in, and develop understanding of, open debate about options for the future, rather than proving reactionary or dominating planning with a negative agenda. 	<ul style="list-style-type: none"> • Residential interests oppose change and are seen as diametrically opposed to vitality and viability, but further limit opportunities to sensitively manage issues arising as enforce constrictions on the possibilities of town centre growth. • Benefits could be secured from (and for) communities if the consultation was not divided between applications and strategy. • Although town centre interests 	<ul style="list-style-type: none"> • Communities can add flavour to the success of London as global urban destination, instilling their characteristics through all sorts of participation as consumers and residents. • They can be used to effectively legitimise funding capture, and should recognise opportunities to partake in formation of social outcomes in resulting programmes.

		are wide, local community pressure can help expand (or give succour to council attempts to) the scope of planning from traditional concerns/orthodox perceived restrictions.	
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What purpose should *orthodox retail planning concepts/ new planning thinking* serve in major town centre redevelopment in London, according to....

	WEP	AD	SSP
Orthodox retail planning concept	<ul style="list-style-type: none"> • Concepts serve to give expression in formally accepted terms for a case supporting a pre-agreed development, and for points of common reference in change management. • As well as its powerful path-dependent influence, the notion of hierarchy holds practical purchase through its utility in defining LPA jurisdictions, and in political expediency for justifying decisions. 	<ul style="list-style-type: none"> • The borough attempts to apply the hierarchy notion internally, serves, but in defining the extent of ambition deemed appropriate, it dampens down local distinctiveness and spatial variation in consumer trends. It is used to justify greater intervention at the lower scale, [possibly with ad hoc outcomes for town centres prospects]. • Vitality and viability focus can be associated with managerial/reactive rationale for town centre planning. • Diversification is seen as problematic from both a local planning and retail as social service perspective. 	<ul style="list-style-type: none"> • The current policy environment can accommodate clear definition of individual objectives, but does not give an applied framework that is sensitive in assessment of town centres. • Hierarchy serves as a base in the sense of the uniform starting point around which concepts have to be implemented.

<p>New planning thinking</p>	<ul style="list-style-type: none"> • Empiricism commonly is problematic at local and regional levels (for informational and practical reasons, respectively), and should be more sensitive to the consumers it seeks to deliver on behalf of. • Positive planning should be a proactively beneficial switch towards ensuring town centre improvements are delivered through consideration of future paths and acting on objectives, not necessarily mirroring current circumstances. • Polycentricity should be advantageous in holistic option shaping, but for actual implementation stands defined in relation to the expression of existing network concepts. 	<ul style="list-style-type: none"> • An empirical approach should be handled with caution in recognition of limits to knowledge availability and the concomitant pro-development slant given to decisions. • There are few incentives for contemporary positive planning, although history suggests this could be different. • Polycentricity is implicit when local planners look up and decide to think beyond local horizons. 	<ul style="list-style-type: none"> • Positive planning is of limited relevance to current developments due to the approach of LPAs. • Decentralisation is the dominant hypothesis when seeking descriptive insight across a metropolitan scale. • Retail planning needs to better deploy ideas around the definition of town centres. • Polycentricity is an interesting notion in London indicating possibilities and constraints.
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SPECIAL NOTE

**ITEM SCANNED AS SUPPLIED
PAGINATION IS AS SEEN**

West End Partner, Large National Property and Planning Consultancy.
2.3.06

MA Can you outline your professional experience before we go into the main topics?

CG Sure. I am the Planning Partner of XVZ Xwepqil [confidential]. I am the Partner responsible for the retail and town centre planning issues. I have about 18 years experience advising the public and private sector. The most notable major cases I have been involved with is the Merry Hill inquiry, the Brent Cross inquiry writing the Good Practice guide and retail need impact, planning Stratford city for Chelsfield and I guess a specialism advising on strategic retail and town centre planning issues.

MA Did you train as a planner or chartered surveyor?

CG Both. I trained as a planner and then I studied separately to become a surveyor. So I am dual qualified as a planner and P&D surveyor.

MA Can I start with a general question. A personal opinion really as to how successful you see contemporary retail planning in London and on what terms you form that view?

CG I think the overview is that obviously until the London plan, there was an absence of strategic London-wide planning and I guess that a slightly cynical view is that even with the London plan whilst there is now a policy framework that would enable strategic planning of town centres, what has actually happened in practice has been a post-doc rationalisation of a number of schemes that in effect had their origins pre- London plan. So you have got White City, evolution of Brent Cross, arguably Elephant Castle, Stratford city and other such developments which whilst laudable developments at the end of the day most of those were set in train before the London plan and the experience was the GLA missions looking at London wide retail needs and centres the game was largely to assess the impact of a number of schemes that were already along way down the road. In summary, we have a policy framework that now will enable a rational regional and sub-regional assessment of town centre needs. I don't actually think that that assessment has ever been done in London.

MA Do you think the new development plan system will make a difference to that in terms of obviously the London plan was a new form of plan in its way but in its boroughs and their preparations, or is that likely to continue as before?

CG I think the new system in a sense that it attaches more weight to an RSS that should provide that regional top-down spatial strategy and dimension, that should assist, but essentially that is what the London Plan is already. It is providing that regional guidance, as I say, the acid test with new planning framework is not so much whether the framework is up to it but whether the resource base and skill sets are there. I think that is a perfectly rational approach to have regional or sub-regional assessments which should help form regional network hierarchies and inform local decision making. Probably my experience is that there is a lack of objective and timely analysis taken at the regional and sub-regional level to support those policies, so that you tend to get is fairly bland generic policies applied at regional level which

often say little more PPS6. They don't actually confront the issues of change. It is very difficult as I have seen in Merry Hill, for example, to really deal with the gritty issues of defining new centres, changing networks. So in practice what is going to happen is that a lot of those decisions are going to end up being argued at the planning application and call in stage because they are not being confronted at regional level. That is often about the lack of resources to the regional planning bodies to do the work, or lack of political consensus to make things happen.

MA Thank you. I think that is a good introduction there and we will come back to some of the issues. In terms of starting from the bottom up, I am interested in to start with, what you think local authorities in particular still bring to planning of major town centre redevelopments?

CG Local authorities still should be the catalysts of bringing forward major town centre developments. That is always the case in the sense that they have both the powers of the planning authority, the ability through core strategies and their action plans to identify and bring forward key sites and they have compulsory purchase powers to deliver them and the ability to form development partnerships. So I think they will always be the key catalysts for bringing forward development. I think the issue of the point where the role of the regional special strategies or sub-regional guidance comes in is only relevant where local authorities are seeking development goes beyond what we regard as an appropriate scale and is seeking to change the network or hierarchy. That is the classic case of Bracknell, where it seems to me the problem arises where an individual authority sort of seeks to promote a major scale of development that is out of scale with local needs and the role of the centre will be in the defined plan and those are decisions that ultimately should be taken at the RSS level. That is the only point where there should be intervention.

MA You mentioned in terms of CPO and land ownership. Would you say boroughs in London at least are moving towards the proactive planning that PPS6 encourages for retail development?

CG Generally, no. I think not so in London boroughs. The problem is that there are normally more reasons not to be proactive and bold in using CPO powers of driving forward large development, than reasons to do it, in the sense that London in particular is obviously an area of very high land values where key sites are in the hands of and are controlled by highly articulate represented bodies and where driving forward large scale development through CPO and certain partnerships for what generally tend to be large buildings, large traffic generators, large servicing requirements, whilst PPS6 is advocating that you should take a more proactive approach, the fact of life is that it is often easier for a large local authority to take the line of least resistance, which is not to try to take on all those interest groups, not to try to address the difficulties. And that is why I think generally, with some exceptions, Brent Cross obviously, Stratford City, White City which have been generally cases where there is a large amount of land in public or public-private ownership that hasn't required the use of CPO, there are very few other examples where that sort of large scale transitional change has been brought forward, simply because it is in the too difficult category.

MA OK. One last question thinking in terms of the local scale. What do you view as the role of the local communities in the redevelopment of the town centre? What is most beneficial and what traditionally tends to happen? How do you see they normally exert influence?

CG Well I think that normally that it is a reactionary influence. It is disappointing that it doesn't tend to be, in my experience, more of a ground swell of local opinion to try to drive forward local change to achieve improvements in the quality and range of shopping facilities. I don't know why, but whether it is because the public at large find it difficult to actually understand or to articulate what is missing in their local shopping centres, so the role tend to only become evident when the nature of the development is proposed and comes forward and then it tends, but not always, for those to be adversely effected, be they local shopkeepers or adjoining residents, who suddenly spring into life. So, I think it is a shame that there is not more local community involvement driving forward an agenda for change.

MA That lack of positive engagement, does that normally, if we were seeking to move on from that, is that the role of the planners or is it more of a matter of the political system and the way of the nature of how local representation works and how the policy agenda is set?

CG I think part of the problem is, and it goes back to the new planning system and front loading of public consultation which is that a generalisation, but as a generality local public if they are consulted up front in terms of front loaded. Of community involvement, they are not generally able to articulate what they want, or understand what the options are, to really express a view, and therefore certainly our experience is that if you ask people cold what they think of their of nearby town centre they may have a view that there is not enough parking or it is dirty, or other maintenance issues they may go further to express a view that they would like a John Lewis or a Marks and Spencer if they haven't got them. They tend to be on the public wish lists. There may be only one or two retailers. What they don't generally articulate is how a centre can change because they don't necessarily understand the viability of the economics. Which is why a system of objective assessment of what the options are, looks at feasibility, looks at capacity, looks at alternative sites and brings forward alternative options for a centre, forms a better basis for public consultation, because then what you are doing is consulting the public based on real options and you are giving them choices as opposed to this rather open ended what do you want to see, which to be fair most people who aren't in the planning industry are not very well equipped to answer.

MA Excellent. Moving on now. Just interested...from your experiences the lack of any serious hint of an appeal in terms of the long evolution of the White City project development of that scale, would that normally indicate anything in particular about the relationships between the developer and the planning authorities or is that not the nature of the beast?

CG I am struggling to answer in relation to a specific development because I ...

MA just in terms of that scale, quantum development in central locations...

CG The experience in London is all you can go by the experience in other centres. I don't know the background to White City, but it is obviously one of these cases where the origins of the consent go back some way and what therefore has happened is there has been an evolution of a position and now arguably national policy has moved on, but the extension has been granted and maintained and worked with. I think it is public record that people like Ken Livingstone has said that had White City come afresh to the GLA now it would have faced a very different set of policy hurdles. So it is very difficult to comment on schemes that owe their evolution to the dim and distant past. I think that Stratford City is a case in point of a major metropolitan scale retail mixed use development that has come forward through effectively the London plan process and scrutiny of the Mayor and obviously was not the subject of an inquiry. I think that was only as a consequence of a very extensive and intensive process of public consultation, stakeholder engagement and frankly an overwhelming statement of the technical and political social case for that development. The other big London example is Brent Cross, and again that probably illustrates two very different approaches to delivering this scale of development. The first approach being Hammerson public inquiry, which was hugely expensive and ultimately fruitless, and then the decision to go forward through the local plan route in partnership with the Cricklewood rail lands taking a much more consensual approach, much more stakeholder involved which went through that process relatively smoothly. I think what those three examples illustrate is there is a very different ways of delivering, but they all show you can deliver major change and major change of mixed use proposals but you do have to follow the right route and have a sound technical case for doing so.

MA Yeah. It is still more about partnership in that way and who you forming an alliance with has got to be broad enough. OK. Thanks. We touched on this earlier but it would be interesting to talk about it in more detail. Just thinking about in particular the single most significant thing. What have the GLA brought to the establishment of planning in major town developments?

CG Well I think that the London plan has imposed or established a network or hierarchy for centres that is understood so it has provided a means of assessing cross-borough, the role of different types of centres, network of major metropolitan centres. I think it has provided a vehicle to deliver London wide views on capacity through the experience of putting convenience and comparison need assessments, so it has provided a way of giving some top-down regional guidance. I think the technical issues relating to the very first pieces of work, but never the less I think that is an opportunity for having a well funded regional planning body. And, I guess it has also brought a external measure of cross-checking or verifying proposals against a common set of criteria. So in that sense it has been a broadly positive influence, but what it hasn't yet done is actually objectively look afresh at the London wide hierarchy network of centres and actually take a proactive approach, it has been largely reactive to initiatives that have come from individuals or individual local authorities.

MA That is very interesting. That level of involvement – there is obviously practical advantages on the scale of the organisation and the fact that their strategy is now a statutory plan. In terms of their role in decision making and what DC powers they have now and what they may get in the future: you talked about acting as an additional influence, are they well placed in terms of making a balanced decision or

do you think that to some extent they are just too involved on lobbying for growth or are there conflicts that arise there? Any thoughts on those kind of issues?

CG I think it very much depends on your perspective, in the sense that what planning is about is often about meeting wider needs and projecting local amenities and issues and it follows that on any range of needs, not just town centres, in fact others like incinerators and combined heat and power stations and waste disposal sites and all these other difficult issues. Fundamentally, evidence suggests you do need to have an objective regional or cross-local authority body taking those hard decisions, hopefully on the basis of rational evidence. I think that what you get is a balance between individual local authorities that may be unduly swayed by local politics and forthcoming local elections which make them too timid and not prepared to take difficult decisions that are needed to provide the shops, the offices, the houses that people are going to need, and the role of the GLA which obviously can be accused of not being locally accountable or locally in touch. So I think it is a very difficult question to answer, there is a balance that needs to be struck and I think experiences in some London boroughs, they appear to be applying a disproportionate weight to the views of the small vocal minority and I think in those areas, the intervention of the GLA to drive forward things that are in the national or London economic interest is a positive thing.

MA A lot of those are to some extent quite generic features of well funded robust regional authority. In terms of the particular approach that they have taken: for example, the notion of polycentricity and talking more about in terms of the forthcoming review looking at the role of suburban locations – do you see that as scope for real innovation there, or would it just be a reflection of reality of what's on the ground in the real role of the centres outside of central London play?

CG I think there is a real opportunity to re-examine those issues. We looked in the Black Country study. We undertook the Black County consortium at how you would apply the concept of polycentricity to a network of strategic centres and as a matter of theory obviously offers advantages in terms of identifying the core offering that you would expect in strategic and major centres and identifying particular uses or functions that individual centres could provide which collectively add up to a whole. I think the problem that the GLA will face in the next round of the London plan is that it is still likely to be responding to individual opportunities that are coming from the bottom up and the difficulty in a very very densely populated highly developed and a massively expensive property market that we have now in London is how much more the GLA can do second time round in terms of planning for major change in town centres beyond what is already coming through individual bottom up initiatives. I think it is a great concept to consider polycentricity and how it could apply to strategic or major centres but to effect that scale of change and intervention in individual sectors even with increased powers to the Mayor I think it is going to be very difficult to achieve.

MA Excellent. I think we might conclude on some of those points a bit later on, but just a general point now. I am interested to know do you think the effectiveness of how policy performs, retail policy in London, is that well scrutinised enough? In terms of both the development process and the retail market as opposed to the pressure by developers?

CG It is a very difficult question to answer. I don't sense that government office, London and the Mayor, both exercise a measure of jurisdiction on how individual local authorities are responding and complying with national policies. So in that sense I have not reason to believe they are scrutinising policies in London any less than anywhere else. I think that through both functions GOL and GLA there is a measure of hopefully consistent scrutiny of individual boroughs policy making and also of their decision making of major projects probably greater than you would get outside of London, again because I think we have actually got a pretty well informed and pretty well resourced organisation in the GLA.

MA Yes, yes. So as an aside on that but could be quite relevant: you see a continuing role for GOL independent of GLA in terms of obviously in central policy, application of national policy. Personally you would support that continuing?

CG Yeah, only on the basis of if you apply for three tiers, it is quite possible that it would have extended powers to GLA whilst at the moment the retail field may regard itself as an upholder of PPS6 and be pursuing policies that are broadly compliant with national policy. That could be simply happy coincidence that the government of the day and the political complexion of the GLA tend to be the same. So the reason why there would still need to be a national oversight is that whatever the additional responsibility granted to the GLA or another regional planning body would be it still has to follow and comply with national policy guidance and it is not inconceivable that at some point in the future if we had a different political complexion in the GLA or a different political complexion at central government level that the GLA would be exercising powers of direction over individual authorities to influence proposals that were contrary to national policy and that is why you are going to need that safeguarding role of GOL.

MA Thank you. You raised this earlier, but coming back to that: how well does planning policy address the future of existing or potential town centres against its own raw objectives in terms of sustainability and spatial planning?

CG I think that it is very hit and miss in the sense that individual planning bodies or individual local planning authorities have very very different agendas, very different levels of resource and expertise to the issues. There are still many who don't undertake any form of survey basis, any form of effective forecasting in order to inform their planning strategies for their town centres. Those that do and who are more proactive again the situation varies enormously. Some are much more proactive and genuinely identify scope for change, both scope for expansion and also authorities who are not willing to accept and confront the needs of diversification and consolidation of centres. I guess there are some good examples and some very proactive authorities. There are others that even if they take advice it tends to be much more along the lines of safeguarding the current hierarchy of status quo and very simplistically assuming that growth in new development will continue to follow a historic hierarchy and will be apportioned based on the current network. Again, simply because in some cases it is just too difficult either intellectually or politically to deal with the concept that the role of centres is changing and some will go up and some will go down. Indeed, and some are going to be created and fundamentally the role of

new centres and the birth of new centres like Brent Cross, which again is a very challenging issue for some authorities to deal with.

MA On the proactivity and how that differs between boroughs, clearly politics as discussed can be influential. Compared to that, how significant are issues like the role of senior officers or indeed the alternative could be just the characteristics of the borough in terms of its demographic profile, its location etc. How significant do you see they are in how proactive the boroughs tend to be?

CG I think good senior officers have a huge role to play. I think again that in my experience it varies enormously, but there is no doubt dynamic, intelligent, proactive senior officers, be they planning officers, chief executives or other senior officers, can very much lead a drive forward of key changes in the development of town centres and networks. They have to obviously carry their members with them but that is the skill of senior officers that understand the limits of what can be achieved, or have the ability to influence and if necessary, change members minds to do what needs to be done. I think it varies hugely. Yes they can be absolutely key.

MA OK. Thank you. I think we will take a break there and turn this over.

Side 2

MA Well, to think previously you have called for more technical advice and support to aid retail decisions. Is that purely on a technical retail analysis basis or is there a need to address issues in terms of what we do and don't know about how different centres within a city interact?

CG I think on both levels there is a greater need for the higher level research to understand the concepts of polarisation, polycentricity, of networks at an academic level but I do think there is also a significant lack of the right sort of quality and objectivity of analysis, and I am not just talking about retail capacity or leisure capacity and some quantitative assessments but also understanding qualitative issues about range, choice, access to key town centre uses and I think there is also links with the work we are doing with ODPM on good practice guidance. There has been a general lack of understanding of the need to consider alternative scenario testing and to assess future networks and future models for meeting town centre needs in different ways and that is certainly something we are advocating through the forthcoming good practice guidance, which is that it should be the role of certainly regional and also local planning authorities not just to identify simplistic trend based forecasts about the growth in individual centres but to actually look at alternative scenarios of meeting that growth, be they through re-balancing networks by elevating centres in the hierarchy by creating new centres, whether by adopting a polycentric approach to meeting the needs of key town centre uses or traditional hierarchy based approach. All of those options which I say generally at the moment have not been properly explored apart from one or two cases like Black Country work we have done. But I think that tends to be the exception.

MA So you are confident that there is the actual capacity there, the technical knowledge and the consensus even between the retail industry and the planners for that to be done to sufficient accuracy for it to be regarded as legitimate enough?

CG No. I still think it is the right answer, it just may be in the too difficult category at the moment. There obviously is, in all walks of life, a disconnect between what the ideal answer is and what you actually achieve in practice. I certainly think we could do a lot better and I would be the first to say this is not, however it is done, it is not a science, it is not something that is capable of entirely objective and robust quantitative analysis. There are political judgements involved however you approach this type of exercise and I don't think it would ever be a detailed modelling type exercise of scenario testing, but I do think the retail industry, the development industry and the local authorities would all potentially benefit from having a process which more openly debated alternative options at particularly the regional level instead of the current system which tends to rule out options very early on. The obvious cases being some of those regional planning strategies replacing RPGs that say up front, for example, there will no expansion of The White Rose centre or Meadow Hall, almost to rule that out as an option before you get any further. I think that there would be a consensus to my view from developers, retailers and local authorities that a better way of doing this is to look at all options. To have nothing sacrosanct and to debate the options and then obviously where the consensus breaks down someone has to make a decision. I think that decision ought to be based on a public debate on the options based on the best available evidence of the pros and cons of each, or the implications of each, and then a decision is made and at that point some parties will disagree with the decision, but at least they cannot say that it has not been properly aired and discussed.

MA The omens in terms of some parts of the GLA Experian work aren't particularly great, but

CG ...Exactly, without wanting to go too far down the technical shortcomings of that work it wasn't just what I described in terms that on the comparison side it was post-hoc nationalisation of decisions that had largely been taken. In effect, the best you can describe it was as an impact assessment of a number of schemes, most of which had already got consent. It actually never tried to give Experian their due. It actually never tried to be an objective assessment of alternative ways of meeting the growth across London. That wasn't the brief.

MA On a convenience side there are some issues to do with efficiency and...

CG I can talk at length at the shortcomings of the convenience side. Suffice it to say that I think the first and fundamental problem was I don't think it is the role of regional planning bodies to try to assess the role of convenience shopping. I think fundamentally convenience shopping is a local function that is best left to local authorities to determine. The technical challenge of trying to objectively assess food shopping needs across an area the size of Greater London is such that however diligently it is undertaken, or whatever budget the authority is given is almost by definition bound to be wrong. I think the Experian assessment was patently wrong in every respect that I looked at. It just showed that with the wrong type of assessment to do it wasn't required by policy, and what came out, wasn't worth the paper it was written on.

MA Yeah, yeah. It was probably harder at a local level given the practicalities of local government which begs the question that if that exercise can be done at all.

CG Well I think it can more easily be done at local level where you are looking at fewer permutations. You actually have fewer stores and centres to consider, you have the ability to look at qualitative indicators as well, not purely doing a desk based number-crunching exercise. At a local level frankly it is the only way you can assess food shopping needs at a local level by looking at existing provision, by looking at the quality of the provision, looking at issues such as over-trading, overcrowding of existing stores, which was ignored by Experian and I think my experience is that you can get a reasonably objective measure of whether a local area is well-served or poorly served by local food shopping facilities. I think it is very difficult when you do it at a national level as all those local issues get lost and what you end up with is a highly aggregated figure which is highly susceptible to any number of variables. I wouldn't give up hope about the role for local convenience need assessments but I would question whether it is good use of anyone's money to try to do it at regional level.

MA OK. Just returning to the comparison side of the equation in particular. I am interested ...do you think planning can actually deliver or be effective in seeking a more even spread of retail development across London town centres given the tendency of prime high street retailers to concentrate in certain locations.

CG Well I think that is certainly a real challenge, and it is not a new challenge. It is something that the CSE has been trying to facilitate through the smaller towns initiative and you are right to say that in some respects it is trying to work against retail trends which have been tending towards polarisation for good sound commercial reasons. It is often more efficient for retailers to operate a smaller network of large units in large successful centres that offer the range of choice and attractions that customers come to expect. I think that any London wide or local authority based town strategy that tries to change that or reverse that on-going trend is starting from a position of disadvantage, but that is not to say that it is not achievable. Ultimately, there will be limits to the capacity for large dominant centres to carry on growing. There will always be opportunities for innovative councils or developers in smaller centres to fill in the gaps and there will be sites such as Stratford City, frankly, where sites do come forward that do create the opportunity to create new centres that add to the retail network. I think it is a major challenge and it is only those authorities that have actually got the courage and resources to try to do that and really force a change. Those that are able to bring alongside and carry with them developers and retailers that they will actually be successful. I certainly don't think there is any point in local planning authorities to do that against the direction of flow that retailers, developers, and investors are going because they will just be wasting their time.

MA So, that could happen almost independent of any requirements for any large scale regional organisation then or co-ordination, it is just a matter of bottom-up?

CG Well, I think that it could happen in individual parts of London, where individual authorities take the initiative and are proactive. The issue is whether many authorities will take that initiative without the lead or guidance or influence of a

strong regional planning body. I think you can achieve those sorts of change at a local level if you are a proactive individual local authority. It also depends of whether the aspirations of the authority actually go beyond what a local planning authority should be doing. In other words, if they are actually creating centres to regional or sub-regional status beyond their remit as a local planning authority, that is where you actually need the regional planning body to arbitrate and to resolve disputes that will arise between individual authorities. But no, I am not saying that individual councils couldn't contribute to that but what I am saying is that that will happen in an ad-hoc basis as opposed to a more rational top-down approach which would in theory be achieved if the GLA took the lead and put the time and effort in to trying to properly plan for London's retail needs over the next 20 years, as opposed to responding to piece-meal ad-hoc proposals, which is what they are doing at the moment.

MA It is obviously a long and savage trend as you said. Do you think that there is a possibility that retailers could adapt it if a prescriptive enough policy basis was in place as they actually did, as some of the markets did in the end. PP6 when it was first introduced at the out of town restrictions.

CG Yes, I think that the retail industry has shown that it is quite adaptable. The key factors are that firstly policies have to be applied on a consistent basis, that is consistent nationally and also over a consistent period of time, because everybody wants a level playing field, everyone wants a measure of policy consistency if you are making long-term decisions. And also I think that it has to be fundamentally rational for retailers and you could argue that a lot of the PPG6 changes in terms of formats were rational for retailers in the sense that, for example, they have been able to develop some small store formats that are capturing markets that were missing. They have been able to develop stores that work every bit as well as large surface stores with undercroft parking or deck parking that actually appears to be trading every bit as efficiently as stores that had surface car parking but on smaller sites. So they have been able to reduce site acquisition costs, and they have been able to pursue mixed developments with residential above, not as initially because policy enforces the m to do but now it is a rational thing to do to maximise site value. I think that is what you will see happening and you can take any number of retailers, take Debenhams for example, developing or driving a new concept desired by Debenhams which is a smaller format department store which would provide a department store offer which would be something that would work in a lot more towns than the Debenhams offer. Now, I don't think that is something that is driven by planning policy, it is certainly consistent with planning policy. It would enable some of these smaller town centres to attract retailers which in the past they haven't been able to. The point is that this is not purely a policy initiative, it actually only works when policy also matches the commercial realities and aspirations of the operators.

MA Excellent. Just drawing to the end...I would like to talk in particular about developments that are not proportionate with the scale of the existing centre. Is that a major concern for you then that perhaps with the inclusion in PPS6 with that as a consideration that we are getting blocked in to a more historic pattern rather than consider it afresh or an optimum pattern? Is that a risk?

CG I think it is a risk but that it is only a risk if regional planning authorities don't take the responsibilities placed on them seriously. I think that it seems to me that all

PPS6 is saying is that if you want to for example turn Brierly Hill into a fully functional strategic centre or regional centre, that it is a regional issue that has significance that goes beyond the boundaries of the borough and therefore is something that should come forward through the RSS. So it is not a problem of the policy structure it is more of a problem than if the regional planning bodies preparing RSS's are not dealing with these challenges or are ducking the issue then yes, there is a danger that in the local level we are simply enshrining established hierarchies for ever and a day, because nobody's got the ability at the local level to plan to elevate or in some cases to demote centres. I think in some cases, we are involved in there are policies where it is fair to say that regional spatial strategies haven't been able to confront the issue but have at least identified that there are centres that might have the potential to evolve and have said that that should be a local issue. My preference is that ideally the regional planning body should deal with these issues as that provides a basis for cross-authority decision making and is the best medium for doing that, but if not then I think at least regional spatial strategies should identify where there is potential for change and perhaps identify criteria that need to be met rather than just ducking the issue altogether.

MA Do you think that is more of a problem in terms of how planners see the shape of the network and the concepts they rely on in seeing the distribution of centres through space, or for example outside of London is there more of an issue about the capacity of RSS's and the political requirements behind them and the level of resources of the organisation? Is it conceptual?

CG I think that the reality of planning is obviously that if you maintain the status quo you offend the least number of people and if you have the responsibility as a regional planning body in trying to keep a disparate group of local authorities happy, invariably the safest way of doing it is to maintain the status quo. And that occasionally ducks the issue, but I think that what is required if regional planning bodies are to intervene rationally, because we have got network centres that have evolved based on what are now historic patterns of development and historic patterns of employment, and therefore we have networks and centres that have arguably long since lost their function, which is very much the case in the Black Country where the pattern of centres reflects economic realities of 50 years ago which are just no longer, rationally, you need in those places, to have some radical changes in the roles of centres. So that requires technical expertise to actually work out what is achievable and what is not and the impact of different options, but it also requires political consensus and some fairly strong leadership at senior office level to drive forward those changes because inevitably in any change like that there will be some winners and some losers.

MA So finally, is there a risk that the emphasis on regional co-ordination of retail planning may fail through lack of political capacity to actually take objective and independent planning decisions? Is that quite a major risk or will be just get by?

CG Well I think what will happen in reality is that if regional planning bodies fail to take those decisions and simply duck them and the decisions are not considered, yes we will end up back where we are now, which may be no bad thing but you will still end up with the initiatives for major change coming forward that will be locally led. It just seems to me that's not always the best approach and there are concerns and

certainly concerns that arose in the case of Bracknell where that if you get major change coming through that route, individual authorities pushing it forward or through a planning application of a call-in inquiry, it is quite unsettling for retailers and investors that are trying to make long-term investment decisions based on published policies and the well publicised issue in Bracknell was obviously Hammerson having invested in Reading as a regional centre saying look we invest long term on the basis of a policy that is supposed to direct investment and we would not have invested as much in Reading if we had known that Bracknell was going to become a competing regional centre. I think that is the downside of major change coming forward on an ad-hoc basis through mutual local authorities, but in my view that if regional planning bodies duck the issue and the RSS doesn't address it, and there is a compelling technical case/policy case for a centre to radically enhance its position, and there is a case we are involved with where we believe that is the case, and it is not being addressed then you are back to where we are at the moment, which is that you either seek the support and partnership of the local authority and other key stakeholders and you bring it forward through the LDF route or exceptionally I guess, and it would be an exceptional case, you promote it through a planning application and you are confident to argue the merits at a public inquiry. I think that would be, in the current policy climate, a pretty exceptional set of circumstances. I do think that is the default route by which the change you are describing will continue to be brought forward. I don't think it will be suppressed even if, as I fear, regional planning bodies actually don't have the teeth to bring about the changes they are meant to be bring out.

MA Excellent. Thank you very much.

SPECIAL NOTE

**ITEM SCANNED AS SUPPLIED
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Assistant Director, Local Planning Authority.

12.3.06

Side A

MA Just to start can you identify your broad experience in town centre planning, a quick overview, and the nature of your involvement in the White City centre scheme, we are talking specifically about the Westfield scheme.

JW Actually I have had experience of town centre planning throughout my career. That goes back to 1973. When I was at Lambeth I did working experience at Brixton town centre and then having moved to Hammersmith and Fulham in 1980, I initially worked on Fulham town centre on various things to do with the planning of that area, both in terms of policy and site planning. One of the earliest projects that I was involved in was the development of what is now occupied by Waitrose which was a council initiated development back in the early eighties. Probably the last council initiated development. And from that I went on in various jobs with detailed planning on Hammersmith and Shepherds Bush town centres both on planning policy and environment improvement strategies as well as other projects. Generally I have been involved with town centres in that period.

MA Excellent.

JW In actual fact for a time in the late nineties, I did have responsibility for regeneration. So I had a different perspective on town centre work.

MA Thank you. Right. First can I just ask, do you think town planning in the borough is more or less successful than other local authorities in London? And why?

JW I think the main problem with town centres, I suppose in this borough, is that they are heavily effected by being so close to West End and Kensington High Street, when it comes to shopping. So Hammersmith town centre and Shepherds Bush from a shopping point of view traditionally have been affected by that, so they haven't been town centres that have attracted a great deal of investment in new shops. In Hammersmith there were schemes in the late 1970s in the Kings Mall it wasn't really until the early 90s that interest was shown in Shepherds Bush as far as major shopping was concerned, with what is now the Westfield scheme. I forgot to say in relation to your first question, that I was involved at the very early stages in what is now Westfield in discussions with other developers who were initially trying to put a site together going back to Balfour Beatties. Then in commissioning of retail impact studies, proposals of Chelsfield. But that development of course is not like a minor town centre expansion scheme so it is a very different scheme like a major scheme. As far as North End Road scheme is concerned as a town centre I feel the problem there is because the town centre is so heavily constrained by surrounding residential, it has been difficult to find the sites, for developers to find the sites, to initiate development, that is why the early 80s council initiated a site which it partly owned. Of course there wasn't development interest in carrying forward the scheme itself then subsequently there was signs of improvement in recent years.

MA Would you say that is a distinctive approach from other boroughs who might be similarly located in terms of the West End. Clearly that is the key to defining future planning?

JW Wandsworth less so. There will be other boroughs that are also affected by the West End, we are particularly close as our residents can very easily get to the West End, whereas Wandsworth is very significantly further out. There have been more opportunities for leisure development, as what we have seen is quite a lot of retail interest over the years in Wandsworth Bridge area, both sides from retail sheds and food superstores.

MA In terms of the overall priorities you have to balance up is the local authorities retail strategy significant within these overall planning priorities?

JW I think in this borough a lot of retail strategies tend to be reactive. In the sites we have mentioned it is less easy to go out and attract the market. There hasn't been a very strongly buoyant investment market in town centres, other than in the Westfield site. A lot of the strategy has been more to do with land use within shopping parades, protecting shopping parades, getting in uses and so on. So I suppose the point is that there has been less confidence than there is a demand there to bring investment to the sites. So there is the car park site in Hammersmith which is dormant at the moment hasn't attracted retail interest. In Hammersmith, when Hammersmith Broadway was developed, there is shopping there but of a particular sort, it is not distinct it doesn't in itself largely compete with the main town centre. Its shops with walking through the transport interchange.

MA Do you think taking that forward, the local commercial circumstances alone shape that level of ambition and how much of a desire there is for your own policy? Are there other factors that have been of significance other than the actual retail interest in the borough in terms of the kind of strategy overall?

JW I suppose you could say in the last 20 years or so the council hasn't been one that generally wants to go out put sites together and, say in the same way as was the case in the early 80s was the Waitrose at the bottom of North End Road. There has been rather less than a proactive approach to perhaps trying to assemble sites, but then that's partly because of where that has been successful in Fulham is because the council did have a nucleus of land owning. So it had something to work with which may often be the case in other town centres, with council housing. Housing land can be used to bring it into the development equation but I don't suppose in Hammersmith that is what happened with the St Martins development in the 1970s when there was land ownership there, but as the council has disposed of that it doesn't actually have the land that can be, so it is very much reliant on trying to encourage private interests.

MA So land ownership is perhaps more significant in terms of retailers land use and town centre uses than for example other major planning priorities, presumably because for example land ownership is more complicated generally in town centres, more fragmented.

JW Well it very often is that's... certainly if the council doesn't own the land you need someone with a very substantive land holding to initiate a scheme. *Pause*

Then continues:

Disappointing that. Given the closeness of say Hammersmith City Centre to West End and Kensington High Street it would have been quite difficult for the council to major shopping development especially supposedly over the last 15 years or so it has been trying to encourage the development of the Westfield site will clearly have an impact on Hammersmith if only in terms of discouraging the investment in shops. The other problem I suppose is what might come with shopping in terms of other commercial development and concerns in some quarters to overdevelop the site. However I think if the market had indicated it wished to see shopping development in say Hammersmith town centre I am sure the council would have wanted to encourage that. There hasn't really been that interest. But again I would say that any body investing in the Westfield proposal in terms of impact so that would be not surprising. But in many respects there are concerns about Hammersmith is to keep the town centre going but to look in areas where the shopping franchises need renewal in a major way this is the place. Some friends just down this end of King Street – the premises are clearly run down, not suitable for modern retail.

MA How would you say the authorities town centres policy is identifiably a local policy and can you give any examples of that?

JW As opposed to strategic?

MA Or generic – a local imposition of general framework that planners use or national up?

JW I think there has been a strong local element in terms of the way of protecting shopping frontages. That is not happening down from government, well is suppose the broad parameters are but we have had a quota in place since the mid-eighties as a way of trying to protect shop frontages initially against incursion of building societies and banks.

MA Where did the inspiration for that lie, the power to drive that through as a major feature?

JW The power to drive that through came because concern at that time estate agents and banks, building societies and so on coming into the shop frontages, and restaurants at that time as well, there was the concern that the retail function was being eroded. I think that was the initial stimulus for the development of the policy and then later on, particularly in Fulham, where there was initially losing retail function then and also the impact of takeaways which many people did not like at all. Sometimes they were rubbish. So that the initial impetus was trying to protect the retail function, later on the added factor was concern about the impact of restaurants on a residential environment, particularly Shepherds Bush and Fulham town centre. Fulham Broadway and round Shepherds Bush green in particular. Especially restaurants or late night activities. And that demonstrates a particular tension that has existed for a while against shops. We try to encourage vibrant town centres at the same time as trying to protect residential environs where people are living very close to a town centre. That is a particular problem because some of those activities are what people look for in towns. To make it successful so that it is not dead at night –

getting that balance right is tricky. So those are very much local issues particularly in Shepherds Bush and some other areas.

MA That is quite important. It, stems, is reflected in the mechanics of how the policy operates. When that was introduced was that seen, or considered in terms of how it might impact on the balance between different centres. That is what I am looking at, at how different authorities shape the balance of different centres and what they define as centres and how they grow.

JW Well, yes, that approach of a quota policy has been looked at differently in different town centres according to their needs. So it is based on as you know a defined primary frontage which will differ in different town centres but has time has gone on through UDP and revisions, there have been differences, other differences in the way it has been applied in different town centres so North End road rather than just have a quota policy on primary frontages has come to a point where we don't want to allow. So the policies have adapted to changing circumstances as time has gone on. I think that is an issue for local centres as well to look at, there is a fairly blanket policy there, whereas there might be a need for more alternative direction.

MA How do you feel the effectiveness of town centres retail policy is most scrutinised?

JW How is it most scrutinised?

MA Yes, in a longer term wider perspective of how the borough centres are performing and changing?

JW How is it scrutinised?

MA If you had to say one thing in particular out of the process in all the different interests trying to get their vision of the town centres and their local area forward, which one of those would you say is the most significant in how town centre policy is developed?

JW I think that is a comment on what is developed. I think the problem is that with policies like quota policies and so on they tend to be fairly well upheld on the appeal plus agreements with appellants in most cases, so I suppose that is another element of scrutiny. Ultimate it is how it survives the test of time. It's appeals. But if we are finding problems.... Returns decisions to a large extent

MA Can you think of any significant examples where the character of overall function of the town centre has been influenced by the appeals mechanism?

JW I'm not sure....

MA ...either directly or indirectly in terms of the possibility of an appeal.

JW I don't know if you have something in mind yourself! I know one concern of how inspectors deal with appeals, there was a case in Hammersmith which had an

appeal and there was a fair bit of opposition to that. Concern about loss of retail function.

MA Is there another one coming up at all?

JW I think when you talk about control about shopping frontages, one of the difficulties is it's a fairly blunt sort of control because as you know we are not really controlling the type of shop, not necessarily that we should do but so much can change without planning control, much more than the changes that do require planning control, possibly more in local centres. In consultation on issues and options recently we are finding people saying concerned about loss of local retailers which is something I know nothing about at all. Loss of local retailers as opposed to this clone high street... But planning controls don't go that far. That is an interesting question as to how we could juggle about with it. There is the current debate about how the act of major supermarkets and whether they have that control. Or not. Then that raises all sorts of issues about the extent to which planning should or should not be involved in competition.

MA Do you see any role in any elected external organisation in any of those respects in terms of further monitoring or considering the wider impacts outside of the borough of how town centres are performing?

JW Depending on the organisation of the town centres....

MA I suppose it would be difficult for it to be truly independent, it would have to be some existing organisation.

JW It can be difficult for individual local authorities to know how far it is possible to go with what might be done, in comparison with town centres elsewhere with different approaches and where different policies may apply. It is very useful to know that. Of course the situation in London in particular is that you fatally alter borough town centres completely. The London plan provides some sort of overall strategy but in only very broad terms, whereas you would have ...all individual boroughs want to do what they can for their own town centres although of course, based on artificial boundaries. Clearly boroughs answer to their own shopping market. But I suppose boroughs are concerned because they have been built on traditional town centres and the town hall.

MA As national government shapes the White City centre project how significant is it in that regard?

JW National government has shaped it more by not opposing it. By not calling it in, by not feeling it is too big a site or going to compete too much with town centres. But of course in terms of national policy in principle it would be seen as a good thing. It is a major town centre scheme that is in a town centre and not in an out of town location not somewhere around the M25. When the current scheme was first improved it was necessary to establish and agree with government office that it was a properly located leisure centre scheme and properly integrated with the town centre. It is not sufficient to be almost next to the leisure centre, it has to have proper links. We were able to demonstrate that we did have physical links with the existing own centre

and work with it. In actual fact the revisions that were made to the scheme over the years have improved that relationship in a physical sense, although of course when its built the relationship.. it will be such a large scheme that its not like many other town centres, when you have got a fairly thriving town centre and you add on a shopping mall this is going to change the relationship. But, town centres and shopping towns will be Westfield scheme and the issue will be about getting people out of that back into the rest of the town centre.

MA You mentioned GOL earlier, do you think government office played a relatively useful role in that regard in terms of London wide experience?

JW In a sense of I can't say how much GOL really looked at it, but they clearly accepted that this was an appropriate development. It didn't look to have it pulled in. I think it is a lot more of that relationship. There were discussions with GOL at that time to ensure that GOL understood the benefits of the scheme- an out of centre scheme that just happened to be in an urban area and was ok. Described as a leisure centre scheme. So it did fit in the metropolitan setting.

MA So would you say local and national retail works fairly satisfactorily together in terms of overall coverage and bringing the skills that are needed to consider the application thoroughly?

JW I think they work together well in the sense that it was possible to establish a scheme which is in conformity with national policy. Of course the interesting question would have been what would the Mayor of London done, if he had been in a position of doing anything? The Mayor of London didn't come into existence until too late to consider the scheme, though he did make various comments about the lack of car parking. I think he probably would have opposed it if he had referred it?

MA With that in mind what aspects of the White City centre you say most clearly reflect the role of the local planning authority specifically?

JW Reflects the role of it? Essentially it's the local planning authority that has considered the scheme throughout. The influence of other authorities is very limited. But through the whole of the history of this the councils view has been in favour of the principle of it. It was encouraged by borough planning policy in the 1980's. not policy that said specifically we want to make a shopping centre, but a policy which indicated that a mixed use approach of some sort would be accepted in order to get what was a very large derelict or semi-derelict area developed. So it was local policy which enabled the scheme to come about in the first place and a lot of local effort was put into discussions with land owners and potential developers in order to get a scheme that was acceptable, which would be supported. Having got in a position of having a supported scheme the council got behind it as they see the regeneration reference to the scheme, but not behind it in the sense of accepting anything, they wanted to ensure that the scheme would in particular bring in investment in public transport which was another factor in ensuring possible problem of extending the town centre. And ensuring other regeneration benefits through employment training schemes and so on and it was linked in to the socio-economic generation. And then more recently as it has moved on in more detail in ensuring that the external appearance of it is going to be acceptable. So although they have been very supportive

in principle, the idea has not been to the point where developers had planned to do what they want. There has been very strict control out there as the scheme has gone through numerous revisions to make sure it still produces the benefits it can. I suppose it is only fair to say that when you go back to the early stages that it needed the council to be convinced that the scheme was going to have benefits because I am certain that if the council had taken a view that it did not a major traffic impact as a scheme, then I think it would have been difficult to persuade GOL to take a similar view at that point. So once Chelsfield got involved in the scheme, it was quite a good partnership effectively with the council, not a full partnership, collaborative working in part Chelsfield appreciated that it needed the council on board in order to get it through, given its size.

MA Who would you say has been the single most influential group in the progression of the White City centre?

JW I suppose over all you would have to say the senior councillors who were persuaded or accepted or understood the major benefits of the scheme and were prepared to go with it. It would have been very easy for the council to say that this was much too big and would bring in lots of traffic and so on. And maybe in some areas that would have happened. But at least we did have one or two councillors in leading positions who could see the benefits and were prepared to champion them, if you like, and accept that though there might be certain disadvantages the overall package of benefits outweighed them. But when you look back over the development of a scheme like this a lot depends on that. A lot depends on councillors and you have to feel that people and the public locally will be in support of the scheme and not oppose it. I think it is undoubtedly the case that with a scheme of that size the planning arguments are always going to be balanced. There are going to be some disadvantages and some advantages and although I don't see any real gap in the officers point of view about the acceptable scheme, ultimately schemes of this sort do need the goodwill on the political side. That is how it should be, because politicians have to make decisions based on, as they are elected to make the decision. I think given the nature of the site, it is not a site with a great many people living around it – only on one side, so the site was fairly isolated, that probably assisted them, they weren't going to be parachuted into a very residential area.

MA Good, thank you. We have only a minute or two before we have to turn the tape over.

Side B

MA In the proposed mods to the UDP in 2002, council rejected inspectors recommendation for the site policy for White City to refer to the amounts and type of retail on the basis that it was unnecessary detail. Would you say this reflects a general view of council on the level of the policy desirable on retail in development plans?

JW I think it probably reflects a general approach not just on retail but more a general approach here which is not to try to tie down things too much where it isn't appropriate to do that. To establish the principles but to allow the details of the scheme to be considered against officers standards but without trying to set what might ultimately prove to be artificial limits on the scheme. Which I think would have

been in this case. The council is not in a position to decide and even if it had wanted to want what those figures might have been different. Also I think that once you get a shopping development of a particular size, a general order of size like the White City scheme then of course since that time the scheme has expanded, a tremendous amount of floor space, but it is very difficult to say that it goes and takes it too far in terms of.. but overall I think that the position of councils views wasn't realistic to try to set limits, it just a problem I think in any event at that time was a judicial review...

MA And the lack of any significant appeal to the size, would you say that was OK. You would probably see that as beneficial. What would you attribute that too? Was it purely collective working?

JW Lack of appeals? We hadn't refused anything. It goes back to what I was saying before, you know, throughout the history of this councils judicial review would have been looking very carefully at it. You got to a point that the principle was acceptable. Then we have a good relationship with Chelsfield and it was still a critical relationship, looking critically at the scheme as things changed and it has been possible to... there have been things that have been proposed, changes that we haven't liked, but it has been possible to negotiate and come to a mutually acceptable position. So it hasn't been necessary to refuse things or refuse additions or extensions. So the lack of appeal is a just a reflection of a good working relationship between the council and developers, where the developers haven't overstepped the mark as far as we're concerned, or haven't pushed things to a point where we would feel that we had to refuse. At the very early stage of the scheme before Chelsfield even came along there were competing schemes that practically got to a planning application stage but there were proposals that would not have been acceptable. They would have probably been refused.

MA Finally on the White City centre, you talked earlier about the influence on consultational policy, how would you say the public exert influence over redevelopment of their town centre. It seems that the direct involvement in the UDP review for example, certainly in the most recent review was quite limited in terms of the White City centre, how do you think given that seems to be the case, the public have had an significant influence over the shape of their town centre though development?

JW Do you asking about town centres in general and in particular...

MA I think in terms of: does the general concept that they might influence the town centre through getting involved in the UDP, has that been born out in your experience?

JW I think with the White City centre, the key stages in terms of planning applications have been rather been out of sync with the local plan preparation process, so that other than right at the beginning when there was a employment policy in fact which stimulated what was eventually going to pass I think, it is difficult to remember exactly when things were happening...

MA 1993 was the big app, I think?

JW 1993, that was just after the draft UDP, after the inquiry wasn't it? The Wider question is interesting because the overwhelmingly the main comments that tend to be made in relation to town centre policy, was that they tend to be conservative with a small 'c'. In the sense that people are concerned about the impact, going down a point that I said before about town centres with a lot of residential around them a lot of the comments you tend to get are in opposition to change, with residential around them, but at the same time, there are people who say, particularly in Fulham, who are saying there is not much in the way of shopping. The way of dealing with that though may be by redevelopment which could cause opposition. That goes back to something you were saying earlier. In various plans etc there hasn't been, over the last 20 years, a lot of people saying about town centres that they should be pulling down these areas and building shopping centres. The views that come in tend to be about the general character as opposed to saying these areas are not strong town centres. There might be an issue there about how people perceive them. If they traditionally go to the West End or Kensington High Street or Ealing they get used to the fact that Hammersmith is not a major town centre.

MA Just picking up on one small point you raised. Looking to the future in terms of development plans and how they are drawn up, you talked about applications being out of step. Do you think the new system will be more positive in how it could handle the interaction between how applications are shaped and how the policy develops?

JW It might do when local land frameworks have been established. I think the problem is the time required to establish them in the first place. When you have got an influence it should be a relatively quick process say to bring forward whatever planning briefs and supplementary planning documents, sites, or even new site policies, but the problem we have now and over the next three years, is that we haven't got a situation where we can do that very easily. I suppose, with the concept of you need the core policies in place, which have to be appraised, the generic control policy and site policies which have to be appraised in relation to the contents of the core policies and then if you have SPD's and planning proofs, then they have to relate back to that chain of conformity and so what concerns me is that ability to move quickly in the next three years, to quickly bring forward proposals. For instance, we are looking at parts of Northend Road, if that led to a wish to establish a site policy, with the planning brief, that the planning brief be usable, given site policy the framework is not there at the moment to quickly put one forward. When the local framework is in place, or for that matter, when the UDP isn't finished you could see a need for a site policy, put forward a revision and probably reasonably quickly take that through the necessary stages to get it adopted. But we have this very complex process for us to get through first before we have got the basic framework there from which we can start slotting in the portfolio of different pieces. So if we had just the UDP then you can relatively easily bring forward a revision to it. I think even when we have the local framework in place perhaps it will not be as quick as it might have been. Overall although the new process is supposed to be streamlined and fast, there is no particular evidence that it is, and it seems to be more complex. I think the balance in favour of working through consultations and sustainability appraisal process is rather a balance between plan making and getting it through quickly is rather out of kinder.

MA Thank you Jon. Turning to regional and national policy now. Council submission to the London plan, the EiP, is focused on two matters. Questioning the London Plan be more consistent with national policy and comments on accordance in applying attention to hierarchy in practice??? I wonder if you think these concerns on national conformity of the London plan and applying hierarchy are still reflected in the London Plan as adopted. do you feel these concerns still hold?

JW Well, as far as the heirarcy is concerned yes because there wasn't a recognition we felt that there should have been for Shepherds Bush. We have had in the UDP review a question of how to account for the Westfield site and it was pretty clear that there was a proposal there. We felt that the London plan could have acknowledged that Chequers Bridge was going to be a major centre, so the London plan hierarchy was reflecting what was there rather than what might be there for forward planning. That partly the GLA's long standing concerns about site. Conformity of national policy I can't actually remember at the moment it causing us any concern.

MA I think the policy in the draft London plan was almost tantamount to a ban of out of town retail and didn't really regard the test saying that it should be subject to the test in terms of local centres.

JW Yes it was rather too focussed on town centres.

MA I am rather interested in your thoughts of what you do feel is the most appropriate role for sub-national retail planning, what ever specific level that it, whether it is regional, metropolitan, in terms of retail and town centres?

JW I think one of the difficulties with retail planning, I suppose more particularly in London is being able to forecast a plan for a particular amount of floor space and to justify that retail assessments that accompany major schemes always tend to take an optimistic view of how much spend is going to be and put forward arguments which justify their scheme, which taken to their logical conclusion will justify a new development every few years to absorb the increased spending. So it is quite a difficult process forecasting planning retail and to some extent I just wonder whether some of the requirements of national planning policy are realistic when it comes to being able to be clear about the demand of need of shopping schemes. To a large extent you just have to say if developers are proposing a scheme they wouldn't do it unless they felt there was a demand that was economically viable. Although that bit doesn't apply when it comes to major supermarkets because they seem to be more interested in building up land and preventing other competitors acquiring sites so they keep up their market share. However, in the interests of sustainability councils should be doing what they can to make their town centres more attractive and reduce the need for car travel particularly for the local shop. But essentially this is where you come up to... I have lost your question a bit but I come back by saying councils can promote retail development in their town centres but they have to be willing to take that step and to put forward schemes and see if anybody is interested in developing them. I don't think councils nowadays, back in the 1960s, or 1970s councils had more land holding and were in a better position to actually really promote town centre development schemes and put forward the land. That is less the case now. So it just depends more through policy, sub-proposals and planning briefs in showing that you

are prepared to consider developments in town centres and to encourage them in that way. But to be successful you probably have to be reasonably flexible about the other uses that might come into the scheme. And clearly you can see that a way forward of accepting private market housing as part of shopping developments is likely to be more successful than one that requires high proportions of affordable housing. Because developers have been put off bringing forward schemes if they feel they are being constrained too much. So that's probably a problem when it comes to some of our town centres. It is what comes with the shopping and whether that is acceptable that is the issue. If you go back twenty years ago the concern was that what comes with the shopping was lots of offices and there was the feeling that it wasn't acceptable. It is probably not the case now, but now the concern would be about private market housing. Rightly, in terms of it not necessarily contributing to housing need but it is a question of getting the balance in priorities if you want to encourage new shopping centres.

MA Given that that relates to commercial pressure, and how local authorities have been traditionally interested in enabling development, as we are looking at the role of retail planning regionally what are your views in deciding overall which town centres across the region are to see significant growth? How legitimate would that role be?

JW Across the region? Do you mean outside London?

MA London in particular for example. Clearly there is a very close relationship from one centre in competition and the impact on another town centre?

JW I think the situation in London is particularly difficult compare to say a town or city somewhere else which has a very clearly defined major centre. In London this is clearly a very common situation.

MA Does that lead you to say that it therefore needs some clear co-ordination or is it perhaps too difficult a task overall that local authorities face on their own?

JW When you are looking at town centres in London say at the top of the hierarchy, their ought to be some co-ordination particularly in the sense that there needs to be some consideration of how transport structure is played in relation to demand. Clearly if a London town centre is going to compete with an out of centre site then it does need very high quality accessibility to public transport and not every town centre will be in the best position to achieve that. Even this far Shepherds Bush is in a position to achieve that. Hammersmith has extremely good transport accessibility but it is not a huge town centre compared to out of centres. You are looking at the very high level town of which there are a small number in London, there should be some degree of what I wouldn't call co-ordination, but strategic regional planning, but that shouldn't prevent some of the smaller town centres like Hammersmith being able to improve their shopping offer because they catch the mainly more local work base but overall it would be beneficial if people get more of what they need in a more local town centre than having to go somewhere else, even if they go by public transport. So there is a limit, difficulty, in co-ordination at the lower level but at the top level given the investment in transport, that is necessary.

MA Thinking about that traditional concept of hierarchies individual centres, I would like to ask you how well does that concept apply as a policy tool within the borough at the local level? How well does it apply a) as a description of the centres of activity and b) how well does it apply in terms of shaping policies for development control?

JW I think to say so at the moment it is a fairly blunt policy tool. I'm not sure, well, in a very broad sense it is descriptive in a general position. we have three town centres, all three of them are different but they are generally local centres, at the local level what concerns me is the description of them as keynote change. Centres is on one level broadly right but there are differences. Some are much larger than others like East End, some may be capable of housing retailers that others wouldn't, so I think ideally we would be doing more to understand the differences between the centres to have different policy approaches in them. Particularly so where it seems.... the difficulty view when you have no consensus is that you could have a local centre which is, has, loads of retail shops but none of them may be providing for local needs. The local shopping thing might disappear because we don't have control over that and the other question with the increasing number of major supermarkets opening small local stores which may obviously provide a whole range of goods, but are not very competitive between themselves. They may actually be for food, but that raises questions about the future of local centres which have traditionally have been based on the idea of ensuring that people can get day to day needs locally. So I suppose the question is if those local day to day needs can be met should we be more flexible about what can happen in the rest of the centre, the future of their uses.

MA Is it important to have a handle on the relationships between the different centres in the borough or could you just let them run individually on that level? Do you need a concept to guide you overall in terms of the distribution of the commercial areas or is that somewhat redundant really?

JW I think you need to understand if there are differences between the local centres which require different types of approach, or more flexibility of control. You could consider schemes on their merits merged with a general policy approach which may be the only way you could do it, but you would have to be prepared to do that and have some basis against which to make exceptions for instance if you decide in one shopping centre you may be prepared to allow a restaurant against a quota where in another shopping centre you wouldn't – it might have a more demonstrable harm in one centre than another. The problems with a developed policy in a sense is providing a blanket approach and saying effectively the demonstrable harm occurs when you go beyond 30% and so on, but in practice you can't really assess the harm purely on the basis of a blanket quota because of local factors which really you should take into account, which may mean that a portion of retail about 50% is perfectly acceptable in one centre but not in another. It is quite difficult because of the London planning control within the A1 use class.

MA And that is predicated on a diversification across all centres, retailshops and services, I am just interested, in terms of there, is there any prospects of local centres meeting retail sanction and what framework guides it?

JW I think that probably has to be looked on at an individual basis. The problem of the diversification of retail is that the sort of, you may have had a low-key Centre which in the past has all been butchers and bakers and green grocers and so on but then it becomes a supermarket and an antique centre and what you are less likely to get is the local white goods shop just serving the local neighbour, or sometimes you might get a local bookshop. I come across one every day in Blythe Road, and I think how has that survived? You are more likely to get retailing shops that require people to go by car unless they are in, I suppose it varies really in some parts of the borough, where people are more affluent you may get more shops, selling home improvements, bathroom shops, tile shops, and so on. Which is fine but you get to a point where they require people to drive to get there and brings some other difficulties. So you get local shopping centres with families when red roofs are put in place objecting to the lack of parking. It may have actually ceased to be a local shopping centre where you walk or are prepared to walk, or rely on passing trade or people being able to drive to get there. So that is quite a associated fact that in parts of Fulham getting local centres and shops that are more like town centre shops or say, town centre fringe shops. I have always thought when you look at the shops in Kings Road or Fulham Road and so on, what would have happened if North End road happened to have a market in it? What would have happened to the shops there? Would they have actually become town shops, fitted shops?? And so on. The other issue is about the smaller out of centre retail stores, such as the ones you get down in Putney Bridge, not supermarkets but leather goods, and there is a bathroom shop near.

MA We have just got 5 minutes left so that is one last question if that is alright? I think we touched on this before but I would be very grateful for your comments on it as an explicit point. Do you see the objectives identifying the future retail needs and making provision for them in development plans in suitable locations, do you see that as consistent with local delivery of sustainable development. How would that work out at a local level given the modern objectives of planning, spatial planning?

JW I certainly think it is very consistent with sustainable planning. In many ways that is the key objective I would have thought for planning and retail at the moment. Is to encourage local shopping in town centres or elsewhere, to avoid the need for people to drive elsewhere or take longer trips by local transport. However that depends on retailers who are not providing day to day needs being able to establish a sufficiently good market in the area. So they can survive on what is in the locality.

MA How do you think that will work out in the future in the borough given the pressure from other uses in the town centre, on a practical level. in terms of actual delivery there might be constraints about how effective it turns out to be?

JW There is constraint because it ultimately depends on whether you could protect shopping parades all you like but unless some one is prepared to move into a shop and take it on, then ultimately you won't be successful, so you have to really pursue a policy of this sort and be prepared to stick with it. Not allow change to any other use or lay vacant on the basis that rather than move easily into some of the units perhaps eventually someone will come along and pay the rent to move in. but then things do change don't they? A few years ago you wouldn't have thought of people like Sainsburys and Tesco opening small supermarkets in local centres.

MA What do you attribute that to?

JW Well they want to increase their market share. They have found there are limits on the.....the major supermarkets have to keep on growing to satisfy their shareholders, so they have to keep on opening stores. And if they can't open large out of centre stores as much as they have done, then clearly it makes sense to open different formats because they will be successful in town centres. I suppose you may ask why did they not do that before? If it is easier to open out of centre sites, then that is the way to go but whatever else happens they have to battle against three other main competitors. The more they can keep their brand in the public eye the better. The small formats do seem to be successful. And that is good, from a sustainability point of view. But from other points of view, not planning points of view there is concern amongst independent retailers and smaller retailers as to how well they can survive. It is difficult for some of the retailers to get going. If you have got someone as large as Tesco's or Sainsburys coming into your shopping parade, with all the economies of scale they have its more difficult for the smaller independent chain to set up. It is bad enough for some of the larger supermarkets!

SPECIAL NOTE

**ITEM SCANNED AS SUPPLIED
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Senior Strategic Planner, GLA.

30.3.06

Side A

MA Can I just ask generally how successful you see contemporary retail planning in London and on what terms? As an opening question?

GB Well I think in some areas we can say that it has been successful in terms of I think of providing choice for customers and consumers and I think of when we think of the incredible diversity of centres and the kind of shopping experience if you like in London, thinking from the delights of the West End, although love it or loathe it in terms of the crowds, in terms of what it offers it is very successful location, down to other locations specialist offers, the Campdens, the Brixtons, the street markets, and I think what policy has sought to do is to encourage growth in town centres and where that has happened we have seen examples of centres being revitalised, centres where they are accessible by public transport providing business services to London as a whole, regardless of whether you own a car or not. So I think in a number of cases we can point to some success stories. There are other examples where depending on your point of view as to whether contemporary retail planning has been successful is the extent to which it has stemmed the tide, if you like, in out of centre locations. I think that is one area particularly in the larger format stores where the current policy may, again depending on your point of view, may or may not be deemed to be successful. I think that your criteria for success would be has it improved choice for consumers, has it maintained or improved competitiveness within London's retail market, has it improved the vitality and the viability of the town centres, and in a number of cases we are seeing very positive steps towards that. However as I say there is still this concern for the longer term future of some centres, particularly some of those that are more vulnerable and in need of regeneration where the extent of outer centre development may be, and has been, a threat to some of those centres. So I think some successes and in other cases more work to be done.

MA Do you see how you would measure success continuing in the future in terms of choice, supporting retail and the in town out of town kind of divide if you like, as it has been so suppressed for the last 20 years?

GB I think in terms of measuring success, what we do on a fairly regular basis is co-ordinate the town centre health checks across London which seeks to look at a range of factors which on the one hand are quantitative and on the other hand qualitative indicators which give you the idea of the types of, or the scale of retail floor spacing or the scale of vacancies that give you an indication of the health or otherwise of the centre, an indication on things like rents, so from an economic perspective gives an indication of whether the centre is thriving or not. That is supplemented with detailed qualitative assessments by boroughs at the local level. So I think some of those indicators can be used at least on a centre by centre basis to indicate whether a policy has been successful. And then looking at the London wide perspective we can analyse to what extent those centres are performing different roles with the London plan and the London town centre network. We can look at the extent to which those centres aren't fulfilling those roles to the full potential and analysing

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